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ABSTRACT

Results are provided from a longitudinal study of 16 local education agencies (LEAs) implementing P.L. 94-142 (the Education for All Handicapped Children Act) over the past four school years. Findings are based primarily on interviews with LEA personnel and community professionals. Results are presented according to the following general topics (sample subtopics in parentheses); (1) procedures and training (child find activities, prereferral screening and intervention activities, parent notice and consent procedures, multidisciplinary evaluation and reevaluation, least restrictive environment, and procedures related to individualized education programs); (2) scope and comprehensiveness of special education and related services (changes in range of handicapping conditions served, and changes related to least restrictive environment provision); (3) sequence of implementation of P.L. 94-142 (procedural changes and variation in the sequence of implementing P.L. 94-142); (4) the overall effects of P.L. 94-142 (on local personnel, parents, and children); and (5) consideration of the factors affecting P.L. 94-142 implementation (including federal and state mandates and court cases). It is concluded that services have improved and that special education at the local level has increased in scope and comprehensiveness, but that lack of resources have hindered the full realization of P.L. 94-142. (CL)

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December 1982

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FOREWORD

This study is one of a series supported by Special Education Programs (SEP) to describe the progress being made by local education agencies in implementing P.L. 94-142 and the challenges remaining. The information presented in this report was gathered over four years (school year 1978-79 through school year 1981-82) and illustrates the continued commitment and effort being made in our nation's schools to provide all handicapped children a free appropriate public education.

At the same time, it is clear that there are remaining challenges in assuring that each handicapped child receives a free appropriate public education. This report suggests certain points where policies may be unclear, or where practices may deviate from the ideals set forth in the Act. These findings are consistent with those of the monitoring visits by SEP staff to each state participating in P.L. 94-142. Where such deviations have been found, SEP has worked with the states to clarify policies, has required that corrective actions be taken, and has required verification that prescribed corrective actions are made. In addition, SEP sponsors technical assistance activities to assist state and local administrators in appropriately serving all handicapped children.

It is our hope that the findings from this study will assist state and local education agency personnel in examining their own policies and procedures and in making any changes necessary to achieve the quality educational services for all handicapped students that are the promise of P.L. 94-142.

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KEY TO ACRONYMS

ACLD	Association for Children with Learning Disabilities
CSPD	Comprehensive system of personnel development
EMR	Educable mentally retarded
FAPE	Free, appropriate public education
HI	Hearing impaired
IEP	Individualized education program
LEA	Local education agency
LRE	Least restrictive environment
OH	Orthopedically handicapped
OT	Occupational therapy
PT	Physical therapy
SEA	State education agency
SEARS	Special education and related services
SED	Seriously emotionally disturbed
SEDOL	Special Education District of Lake County
SEP	Special Education Programs, U.S. Department of Education
SES	Socioeconomic status
SLD	Specific learning diasbility
SMR	Severely mentally retarded
TMR	Trainable mentally retarded
VI	Visually impaired

ACKNOWLEDGMENTS

Because this is the fourth in a series of reports from our study, we feel that it is important to acknowledge those who made major contributions since the beginning of the study, as well as those who have helped us make this final report the best it could be. First, we want to acknowledge the myriad contributions of Marian S. Stearns, the project's original director. Dr. Stearns' initial conceptualization of the study, her keen insights, and her excellent technical expertise have guided us throughout the course of this study. Second, we are indebted to Dr. David Greene, social psychologist and former assistant project director, for his elaboration of the study design and analysis framework. Third, we are also indebted to Dr. Jane L. David, President of the Bay Area Research Group, our subcontractor during the study, for her review of our products. Certainly, the continuing influence of these three colleagues on the successful conduct of this study cannot be underestimated.

We are also deeply grateful to our other former and current SRI colleagues who supported us throughout the numerous information gathering, data analysis, and reporting phases of this longitudinal study. For their in-depth field research and case study reporting, we thank John D. Cressey, Jay Cross, Alexis A. Flippen, Georgia Gillis, and Mary Malgoire. Their diligent efforts and unique insights are reflected throughout previous reports, as well as in this report.

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Special thanks are due to numerous SEP individuals who have provided us with constructive input to our products throughout the course of this study. In particular, we appreciate the following project officers' guidance and patience: Louis Danielson, Nancy Safer, Ronnie Hoffman, and Barbara Hobbs. In reviewing this final report, we especially thank Barbara Hobbs and Martin Kaufman whose thoughtful and thorough review of the draft report contributed greatly to refining the final product.

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Finally, we are very grateful for the invaluable technical assistance provided by SRI staff persons who have supported us during our reporting phases. For this final report of the longitudinal study, we especially thank the following special people: Jacquelyn Brown, Linda Burr, Marion Collins, Klaus Krause, and Shirley Hentzell.

EXECUTIVE SUMMARY

Overview of the Study

As part of its overall evaluation of local progress in meeting the intent of Public Law 94-142, the Education for All Handicapped Children Act, Special Education Programs (SEP) of the U.S. Department of Education contracted with SRI International to conduct this study. To complement other SEP studies of the law, this one was designed explicitly to provide an in-depth understanding of the process of implementing the law at the local education agency (LEA) level*--the level at which the law directly affects handicapped children and their parents. Thus, this was a longitudinal study based on case studies of local school systems as they implemented PL 94-142 over the past four school years.

This final report is based on a synthesis of findings from these case studies over time; it describes the patterns of implementation that we have observed over the last 4 years in 22 LEAs in 9 states.** The study sites were selected to represent the variety of LEAs in the United States in terms of characteristics that would make a difference for the implementation of PL 94-142. These characteristics included:

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*LEAs are a diverse group of administrative units below the state level. In addition to local school districts, LEAs in our study include county school systems, intermediate units, and joint agreements or consortia among districts.

**There were 22 LEAs in the original sample. Budgetary constraints resulted in reduction of the sample size in the last 3 years of the study to a final sample size of 16.

- Compatibility between state laws and PL 94-142.
- State funding formula for special education and the state system of organization for special education.
- Availability of local resources (i.e., the amount of local funding, facilities, qualified personnel, administrative leadership, and community involvement).
- Accessibility of resources (i.e., geographic size and population dispersal).
- Presence of residential institutions, collaborative relationships with other districts, state-supported special schools, and separate buildings for special education.

Thus, the 22 LEAs originally selected as case studies varied in the characteristics of the state systems of education in which they were embedded, as well as in local characteristics.

SRI's findings are based primarily on interviews with a wide variety of LEA personnel and community members (e.g., administrators, principals, teachers, psychologists, parents, representatives of human services agencies) from these sites. The interviews were conducted by SRI staff during annual site visits that began on a preliminary basis in April and May of 1978 and continued throughout the four succeeding school years (1978-79 to 1981-82). Although PL 94-142 was passed by Congress in 1975, the mandated effective date for the provision of a free appropriate public education to each handicapped child was reached just as our study began.

General Sequence of Implementation of PL 94-142

In our conceptual framework, we adopted a "bottom-up" perspective, viewing implementation of the federal law from the perspective of LEAs as a process of mutual adaptation between the requirements of the law and the realities of local school systems. Although the law and its regulations explicitly recognized the necessity of phasing in certain aspects, our bottom-up perspective allowed us to describe the actual sequence of events as implemented in local special education systems. We observed similarities

among many different types of districts in the sequence they followed for implementing the law's requirements. These similarities were further validated and given some generalizability by state education agency (SEA) personnel that we interviewed about LEAs other than those studied by SRI.

When faced with the challenge of implementing PL 94-142, LEAs initially focused on procedural changes in response to the law, and the procedural provisions of the law were put in place very quickly. Initially, some (e.g., individualized education programs) commanded a higher degree of time and attention than others (e.g., evaluation procedures); this difference depended mainly on whether the LEAs had to do something new and different or whether only modification of old procedures was needed. Once these procedures were put in place, they quickly became a familiar and routine part of special education.

LEAs then turned their attention to expanding the scope and comprehensiveness of their special education programs and related services (SEARS). They extended SEARS to children of different ages and handicapping conditions, and they met the least restrictive environment (LRE) mandate by expanding the continuum of available program options. Although the concepts and goals underlying the SEARS and LRE provisions were quickly adopted and internalized by LEAs, progress in expanding programs, services, and the continuum of program options to fulfill these goals was interrupted by the lack of available resources. Thus, whereas we observed LEAs well on their way to achieving these goals in the 1978-79 and 1979-80 school years, we found that the rate of expansion of programs and services had slowed dramatically by the 1980-81 school year as LEAs struggled to maintain the status quo with fewer financial resources. In addition, there was a slowdown in the expansion of the continuum of program options. In 1981-82, the trend continued; we saw a few LEAs making cuts mostly in related services rather than in basic programs, but we also found our first evidence of cuts in special education programs.

Finally, when PL 94-142 was first implemented, LEAs put little time and attention into inservice training of local personnel, whether provided through the state's comprehensive system of personnel development or through the district. Most of the training provided concerned an orientation to the law and its procedural aspects. Although district personnel tended to say that training was important, LEAs generally placed more emphasis on changing procedures and increasing the scope and comprehensiveness of special education programs and services. The fiscal constraints that interrupted the expansion in programs and services during the past 2 years probably also inhibited the expansion of training. Inservice training seemed like a luxury when districts faced cuts in services and programs and personnel layoffs; when cuts had to be made, districts cut training expenses before cutting programs and services (i.e., staff).

Factors Affecting the Implementation of PL 94-142

From our bottom-up perspective, PL 94-142 is just one factor among many that have influenced local special education systems over the last 4 years. A major factor affecting special education is the basic nature of LEAs themselves. All LEAs, in their role as education agencies and public service bureaucracies, share certain characteristics. As a result of unlimited demand and limited resources, educators inevitably have to develop coping strategies and make trade-offs. They must allocate resources among programs, redefine or limit students to be served, establish routines to handle more individuals in less time, and the like. In addition, special educators must advocate for their students; compete with other staff in the school system for recognition, rewards, and resources; and avoid actions that involve reprimands from monitoring agencies. Thus, the interaction between the nature of LEAs as organizations and the nature of PL 94-142 had a large effect on the sequence and pattern of implementation. That is, local administrators and teachers actively determined when and how parts of the special education system changed in response to the federal requirements.

In addition, factors such as court cases, SEP/SEA monitoring, local administrative leadership, state law and regulations, and community pressure have all influenced the practice of special education. For example, court cases and state regulations made some LEAs pay more attention than other LEAs to evaluation procedures.

Each LEA has had to respond to a unique combination of factors within its local context. Sometimes these factors were at odds with one another; at other times they all acted to push the special education system in a given direction. Because of these interactions, it has often been difficult to determine what motivated specific changes. However, we have observed certain patterns in the LEAs visited. The federal law has had the least effect in LEAs that tended to have many resources, active advocates, good leadership, and few basic gaps in programs and services. Administrators in these LEAs often had planned (even before the implementation of PL 94-142) to refine programs and services to meet a full service goal. Yet, change in these places almost certainly would have been slower without the law; PL 94-142 helped these districts move faster toward goals already established. In most LEAs, however, PL 94-142 had a larger impact. For example, we observed a big impact in terms of filling basic gaps in programs and services in several rural sites with little money, leaders without far-reaching vision, and inactive parents. In addition, we saw examples of poor urban areas, or cities in states that have lagged behind in special education practices, where the authority of the law had a big impact on mobilizing LEAs to improve their special education systems.

Although various factors interacted in unique ways in each site, we investigated the relative importance of PL 94-142, compared with other factors, in causing change in special education over the last 4 years. Either directly or indirectly, PL 94-142 has been the most important force motivating change in special education. Without the law, the other factors often would have been less effective in causing change. For example, regardless of whether PL 94-142 preceded or followed similar state laws, the extra impact of the federal law was a significant ingredient for change.

Federal mandates, in general, are a powerful force in motivating change. PL 94-142 has had a significant effect, largely because of the legitimacy it gave to education of the handicapped and the clout it gave to special educators and parents of handicapped children (and, in many cases, because of the money associated with it). A federal law like PL 94-142, stating national policy goals, requiring certain procedures, and backing a service mandate with due process provisions, has a kind of clout that few other laws or other factors have.

Consequences for Students, Staff, and Parents

Because LEAs have incorporated the law's procedural requirements into their special education systems and have also increased the scope and comprehensiveness of their special education programs and related services, more handicapped children have received more programs and services than would have been the case without PL 94-142. Various districts expanded programs and services to handicapped children at the preschool, elementary, and secondary levels; more programs and services than before went particularly to specific learning disabled, seriously emotionally disturbed, and severely mentally retarded children, children who were previously unserved or underserved. Many of the LEAs in the SRI study also increased the range of handicapping conditions they recognize and serve. In these districts, programs and services have been extended primarily to include the more severely mentally retarded or those with low-incidence handicapping conditions. In addition, there has been increased contact between handicapped and nonhandicapped children. For example, in addition to some increase in nonacademic (art, music, physical education) and academic mainstreaming efforts, more handicapped children are now being served in public school settings rather than in separate facilities or centers, institutions, or private schools.

From the perspective of local special education administrators and school personnel, the positive effects of PL 94-142 have outweighed the negative effects. They feel that handicapped students have benefited from

more and better programs and services. Despite the negative effects of PL 94-142, such as increased administrative time and overall paperwork burden, and despite problems regarding the reasonable limits of LEA responsibility, the law gave special education units visibility and power relative to other sectors in the district and gave special education staff the leverage to increase special education service delivery systems. In general, school principals and regular education teachers have become much more aware of special education and more accepting of handicapped children. Thus, the clout, regulations, and money associated with PL 94-142 increased the capacity of LEA administrators and school personnel to deliver programs and services to handicapped children, in accord with educators' own professional objectives.

In most LEAs, parents' awareness of their rights under PL 94-142 has increased over the last 4 years. In addition, PL 94-142 has given more active (and, generally, better-educated) parents a tool with which they can exercise their due process rights under the law. However, although parents' contact with the schools has increased as a result of the law, the quality of parental interactions generally has not changed to a great extent. In general, parents tend not to make contributions that significantly affect decisions concerning appropriate programs and services for their children.

Summary

In sum, the broad consensus in the districts that SRI has studied is that handicapped children are the primary beneficiaries of PL 94-142 because of an increase in the scope and comprehensiveness of special education programs and services at the local level. In addition, most people at the local level believe that the quality of programs and services has improved as well. Children who need special education have been identified earlier, handicapped children who had been unserved previously are now being served, and handicapped children who had been underserved are being served more appropriately now than they were 4 years ago.

However, although LEAs have made tremendous progress in implementing PL 94-142, they still have not achieved the integration of procedures, programs/services, and training necessary to meet fully the intent of PL 94-142 (i.e., the achievement of an individualized, child-driven system). A lack of resources in the last year or two has inhibited further progress in the development of high-quality, comprehensive special education programs and services. Thus, the effect of the law as an impetus to action is decreasing as fiscal constraints begin to dominate. In this era of diminishing resources, however, the law assumes more importance as a tool with which special education administrators can hold onto the gains that have been made in serving handicapped children.

I INTRODUCTION

Overview

Public Law 94-142, The Education for All Handicapped Children Act, is a comprehensive piece of legislation whose purposes are:

> to assure that all handicapped children have available to them ... a free appropriate public education ... designed to meet their unique needs, to assure that the rights of handicapped children and their parents or guardians are protected, to assist states and localities to provide for the education of all handicapped children, and to assess and assure the effectiveness of efforts to educate handicapped children.

As part of its overall evaluation of progress in meeting the intent of the law, Special Education Programs (SEP) of the U.S. Department of Education contracted with SRI International to conduct this study. The purpose of the study was to examine the implementation of the law at the local education agency (LEA) level,* and the factors that affected implementation. For these reasons, this was designed as a longitudinal study based on case studies of local school systems as they implemented PL 94-142.

This is the fourth and final report from this study, based on a synthesis of findings from these case studies over time. It describes the patterns of implementation that we have observed over the last 4 years in 22

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* LEAs are a diverse group of administrative units below the state level. In addition to local school districts, LEAs in our study include county school systems, intermediate units, and joint agreements or consortia among districts.

LEAs in 9 states.* SRI's findings are based primarily on interviews and discussions with a wide variety of LEA personnel and community members (e.g., administrators, principals, teachers, psychologists, parents, representatives of human services agencies) from these 22 greatly varied LEAs. The interviews were conducted by SRI staff during annual site visits that began on a preliminary basis in April and May of 1978 and continued throughout the 4 succeeding school years (1978-79 to 1981-82).

Although PL 94-142 was passed by Congress in 1975, the effective date for the provision of a free appropriate public education (FAPE)** to each handicapped child was reached just as our 4-year study began in 1978-79. It was only during this school year that a noticeable infusion of federal flow-through funds, designed to facilitate implementation of PL 94-142, was made available to the local school systems.***

Background and Framework of the Study

In November of 1975, Congress passed The Education for All Handicapped Children Act (PL 94-142). Although the states all had provisions for educating handicapped children, PL 94-142 represented a statement of national goals for the provision of special education. The philosophy reflected in the major provisions of PL 94-142 includes the following concepts:

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*There were 22 LEAs in the original sample. Budgetary constraints resulted in reduction of the sample size in the last 3 years of the study to a final sample size of 16.

**A key to acronyms will be found on page xi of this report.

***PL 94-142 funds were first appropriated in Fiscal Year 1977 and were distributed for use by the states in Fiscal Year 1978.

- Schools are responsible for reaching out and ensuring that no child is excluded from an appropriate education at public expense.

- Handicapped children should be identified, evaluated, and prescribed appropriate educational services without being mislabeled, stigmatized, or discriminated against.

- Each child must have an individualized education program (IEP) that includes present level of performance, annual goals, short-term instructional objectives, special education and related services to be provided, the extent to which the child will be able to participate in regular educational programs, projected dates for initiation of services and the anticipated duration of the services, appropriate objective criteria and evaluation procedures, and schedules for determining (at least annually) whether the short-term objectives are being met.

- Handicapped children should be educated in the least restrictive environment (LRE) appropriate.

- The process by which the child's program is decided should involve the child's parents and the child (where appropriate), as well as the child's teacher and a representative of the responsible agency of the public school system and other relevant qualified professionals.

- Parents must be notified about a child's identification, evaluation, and placement; parents should participate in decisions and must give informed consent to program changes; due process rights to a fair hearing are to be provided when parents and the school cannot agree on a child's evaluation or program.

- State education agencies (SEAs) should ensure that LEAs participate in state personnel development systems to ensure that staff involved in the education of handicapped children are qualified for their jobs.

Public Law 94-142 can be viewed as a civil rights* and an education law. From the civil rights perspective, the law's superordinate goal is to protect the rights of all handicapped children to a full educational opportunity. In this perspective the law's most salient feature is its

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* Section 504 of the Rehabilitation Act of 1973 is an explicit civil rights statute affecting the education of the handicapped.

emphasis on procedural safeguards. IEPs, LRE, and nondiscriminatory evaluation are viewed as procedures intended to protect each child's right to FAPE. Because FAPE is defined in terms of individuals' "unique needs," this right represents something different for each child.

In this study, however, we have viewed the law from the perspective of educators. From this viewpoint, the law's most salient features are its requirement to serve all handicapped children and its specification of the procedures that collectively define what an appropriate education means. In terms of what educators are required to do, the procedures designed to protect against discriminatory evaluation or placement in other than the least restrictive environment are integral parts of the FAPE concept; due process procedures are the means by which the right to FAPE is protected.

In order to provide the study with its basic orientation and focus, we adopted a conceptual framework, spelled out in some detail in Appendix A (Stearns, Greene, and David, 1980). One part of the conceptual framework specifies the goals a local special education system should achieve under full implementation of PL 94-142 in order to provide special education and related services (SEARS) to handicapped children. When the SRI study first began, we assumed that few, if any, LEAs had fully achieved these goals. Implementing the law, therefore, would require LEAs to bring about change in prevailing practices. The many requirements of the law thus implied two fundamental kinds of actions for LEAs:

- Change procedures in the special education system. Some examples of procedures mentioned or implied by PL 94-142 include Child Find, notice and consent, nondiscriminatory/multidisciplinary evaluation, individual education programs, due process procedures, and placement in the least restrictive environment (i.e., mainstreaming if appropriate).
- Increase the scope and comprehensiveness of special education programs and related services. This includes extending SEARS to children of different ages and handicapping conditions, and meeting the LRE mandate by expanding the continuum of available program options.

In addition, the law recognized that, in order to achieve the goals of the law, LEAs should train all local personnel engaged in the education of handicapped children on all aspects of the law so that they are prepared to assume the responsibilities implied by the law.

Another part of the conceptual framework is our model of the LEAs under study and the context in which local implementation of PL 94-142 occurs. We explicitly adopted a "bottom-up" perspective on implementation (see Appendix A for a detailed explanation). To study the progress of implementation, we focused on local special education systems. We recognized that one of the factors that would explain why these systems change as they do is the nature of the LEAs themselves. For example, there are some basic "facts of life" common to all LEAs (and other public service bureaucracies). Our model identifies several features of public service bureaucracies in general, and of local special education systems in particular, that must be taken into account if the process of local implementation is to be understood. For example, the model emphasizes the importance of the organizational boundary between regular and special education and the fact that daily life in public service bureaucracies is characterized by a constant struggle to meet unlimited demand with limited resources. We also recognized the importance of local demographic differences, the state educational context, and other contextual factors in influencing changes in a special education system.

In adopting a bottom-up perspective, to some extent we shared the point of view of the individuals who deal most directly with handicapped children and their parents. These "street level bureaucrats" (Weatherley and Lipsky, 1977), be they teachers or school-level administrators, are the individuals whose responses to the requirements of PL 94-142 determine whether or not the intent of the law is met. Their responses, in turn, reflect the circumstances of their daily lives of which the federal law is only one part.

Design of the Study

The design of the 4-year longitudinal study was based on the conceptual framework and method of approach developed during the first year of the study and described in the first-year report (included as Appendices A and B). Our original site selection procedure (including the selective elimination of some sites from the study in the last 3 years) was designed to provide maximum variation among LEAs studied on the factors most likely to explain local implementation of the law. These factors include: different state special education laws and funding formulas, different special education administrative structures, availability of local resources (i.e., amount of local funding, facilities, qualified staff, administrative leadership, and community involvement), and accessibility of resources (i.e., geographic size and population dispersal). Figure 1 displays the field sites for the longitudinal study. To convey more accurately the extent to which our 22 LEAs represented a variety of combinations of explanatory factors, we present the following capsule descriptions of each site's characteristics, as of the 1978-79 school year. Those indicated by an asterisk are those that remained in the study for all four years.

California

- *Butte County Consortium consists of 15 school districts in a rural mountain area in northern California. The consortium serves 22,100 students of whom 1,600 are in special education. The consortium was formed to prepare to meet the full education opportunity/free appropriate public education requirements of PL 94-142 and the California Master Plan for Special Education. Chico State University lies within the county and trains special education personnel.

- *Fresno Unified School District is the sixth largest district in California, serving approximately 3,332 exceptional students. In addition, through a cooperative agreement, the county serves the LEA's trainable mentally retarded (TMR) population. Two colleges within the county provide special education teacher preparation. The economy is largely dependent on agribusiness, with a large minority population. Although ranking low on income, the district

FIGURE 1 FIELD SITES FOR THE LONGITUDINAL IMPLEMENTATION STUDY OF PL 94-142.

ranks high on expenditures for instruction. A desegregation plan and the California Master Plan for Special Education have been implemented simultaneously with PL 94-142.

- *San Diego Unified School District is the 11th largest district in the United States, in a city with a large senior citizen population, a large naval base, and two large universities. The special education department is made up of a complex administrative structure that encompasses 5 divisions and 18 different subdepartments. The school district is implementing a court-ordered desegregation plan and has been accepted into the California Master Plan, while in addition adjusting to cutbacks from the passage of the Jarvis-Gann property tax reduction initiative, Proposition 13.

Florida

- *Hillsborough County Schools is the 22nd largest school district in the United States, serving approximately 11,500 handicapped students. Tampa, the county seat, is the regional financial, service, and distribution center for Florida's west coast. A large minority population is present in the county, and there are two universities that provide trained special education personnel to the schools. LEAs in Florida exhibit a great deal of independence as do principals within LEAs through a form of school-based management.

- Okeechobee County School District is located in a poor, rural county in southern Florida whose main industry is agriculture. There is a large Spanish-speaking, Indian, and migratory population within the county. Like all LEAs within Florida, the district is a county system and serves a highly dispersed population of 4,300 students of whom slightly over 10% are in special education. Because of its rural location, access to and attraction of resources has been limited.

Illinois

- *Lee County Joint Agreement is a special education cooperative located in rural northcentral Illinois that was formed in 1967 when it was mandated that Illinois schools provide special education for all children, ages 3-21, by 1969. The joint agreement includes all of Lee County and two or three districts from surrounding counties, and serves 17% of the school-aged population in special education. One of the largest employers is the residential state mental health facility located in Dixon with an estimated 400 school-aged children to be served.

- *Northern Suburban Special Education District (NSSED) is a joint agreement of 23 member school districts on Lake Michigan to the north of Chicago that is composed of a series of affluent, politically astute, suburban communities. NSSED, which has been in existence since 1960, serves approximately 5,000 handicapped children in a total school population of 47,000.

Mississippi

- Itawamba County Schools is located in a rural county in northeastern Mississippi whose main industry is agriculture. The dispersed population of 3,700 students is served by seven schools in the district. The special education program was instituted in 1973 and serves 181 students. The program is supplemented by close cooperation with the SEA and state-directed Area Learning Resource Center.

- *Pascagoula Municipal Separate School District is located in Jackson County, one of the most affluent in Mississippi, due to an economy based on light and heavy industry. The population is diverse, including migrants and refugees who have settled in the area, and who are supportive of school programs. Two nearby universities provide the district with technical assistance as well as teaching personnel. The school district serves approxinately 9,000 students of whom between 625 and 675 are in special education.

Oklahoma

- *Guthrie Independent School District is located in a generally low-income, rural community in central Oklahoma whose population is largely made up of migrant and retired individuals and small-factory workers. The Guthrie School District serves 2,700 to 3,000 students in grades K-12, of whom 222 are served by special education. Limited local funds have hindered the availability of resources and made the district largely dependent on state and federal support.

- *Tulsa Independent School District is located in Tulsa, the second largest city in Oklahoma; its major employers are the aerospace and aviation industries. The Tulsa School District serves approximately 60,000 children located in 4 counties covering almost 140 square miles. The parents and advocacy groups within the community are strong and active. Qualified staff are an accessible resource and there are two nearby state schools to serve the severely handicapped (Oklahoma law prohibits paying for services in private schools).

Pennsylvania

- Bucks County Intermediate Unit consists of 13 school districts located in a suburban area north of Philadelphia. Intermediate units replaced the county school operations in the early 1970s and are responsible for the support services for all school districts under their jurisdiction. An estimated 12,000 exceptional children in Bucks County are served by public schools, a number of private schools, a private licensed facility, and a state school and hospital.

- Central Susquehanna Intermediate Unit (CSIU) encompasses 17 school districts within a five-county rural region of central Pennsylvania. The CSIU provides approximately 66% of all programs and services to the region's 4,000 handicapped students and is responsible for the educational programs at two state institutions.

- *Philadelphia School District is its own intermediate unit, organized into eight subdistricts, and has a public school population of approximately 153,000 students of whom 20,000 are in special education. Of the state's 44 approved private schools for the handicapped, 33 are in the Philadelphia area and the parochial school system is almost as large as that of the public.

Rhode Island

- *Coventry School District is located in Coventry, a middle-class community, considered to be a suburb of Providence, and covers a fairly large geographical area. Of its approximately 5,500 students, between 380 and 420 are identified as having some handicapping condition. Due to its proximity to Providence and the small size of the state, the district has access to a variety of state-supported and private facilities.

- *Woonsocket School District is located in a manufacturing town whose population has a strong French background. The district consists of approximately 9,700 students and serves about 900 handicapped children. The special education budget is largely subsidized by the state and, because the town is fairly near to the capital, it has access to a variety of state-supported and private facilities.

Tennessee

- *Campbell County School System is situated just south of the Kentucky border in northeastern Tennessee and covers about 600 square miles of rural Appalachia. The area is the largest coal producing district in Tennessee and people living in the outlying areas of the county lead a very rural lifestyle. The school

district covers seven towns, and special education serves approximately 17% of the 7,000 school-aged children. Campbell County is part of a four-county cooperative that provides many general services, and the state provides technical assistance and compliance monitoring through regional offices.

- *Memphis City Schools is located in a large urban area in the southwest corner of Tennessee. Two large universities and a number of colleges provide the school district with trained personnel. The system serves 125,000 students in 126 schools, including 16,600 handicapped students. The private school population has increased since the institution of court-ordered busing.

- *Nashville Metropolitan Public Schools is located in the second largest city in Tennessee, the home of country music, and the state's capital. Within the Nashville area there are several major colleges and universities that the school district uses as a source for staff development, program innovations, and personnel recruitment. Advocacy groups are very active and were instrumental in getting legislation, based on the Council for Exceptional Children model, enacted in the state. The system serves approximately 76,000 students, of whom about 11,000 or 14% are handicapped.

Washington

- *Edmonds School District is located in Snohomish County and is considered a suburb of Seattle. The major employers are Boeing Aircraft and the school district; the economic make-up of the district is diverse, ranging from upper to lower income families. Edmonds is the fourth largest school district in the state with a pupil enrollment of 23,500. Special education programs serve approximately 1,500 students and include a separate facility for the severely handicapped. Several universities in the Seattle area provide trained personnel to the school district.

- Longview School District is located on the Columbia River. The sound economic base of the city has made the Longview school system the second wealthiest in the state of Washington. The total enrollment is 8,052, with special education pupils making up 241 of that number.

- Yakima School District is located in southcentral Washington in the fertile Yakima Valley whose economy is based on agriculture. The West Valley School District is one of three in Yakima proper. The district is small and rural, with a school population of 3,315 students that includes 230 students served by special education.

Our basic strategy was to visit each study site twice each school year for a period of several days. However, budgetary constraints resulted in our visiting the sites only once during the 1980-81 and 1981-82 school years. Interviews were conducted at both the school and district levels. Participants have included special education administrators, regular education administrators, principals, special education teachers, parents, psychologists, vocational education personnel, and representatives of human services agencies.

For each of the study sites, we prepared a case study report, updated and emphasizing different issues, in each of the past 4 school years. Each analysis was designed to tell the story of how the law was being implemented in the context of that particular LEA. Case study reports documented, at a minimum, the activities and events that were intended to implement the law in each LEA. To the extent possible, case study reports also described specific features of the local context that explained why the law was implemented precisely the way it was (rather than some other way). Thus, each of the case studies provided a bottom-up picture of local implementation under one unique set of circumstances.

By comparing and contrasting these idiosyncratic pictures of local implementation, we were able to identify patterns and explanations that cut across the diverse characteristics of the LEAs. These inferences about the process of local implementation provide the basis for the findings and conclusions presented in this report. Where appropriate, we have used examples and quotations from the individual case studies to illustrate the findings.

Because our sites were selected to represent maximum variation on factors influencing local implementation, our findings about what explains progress or lack of progress generalize to sites beyond those in our sample. That is, when we provide an explanation for how or why something is being done, we are reasonably certain that the relationship is applicable to LEAs in the nation as a whole. When we describe effects on LEAs generally,

these too apply to LEAs beyond our sample, since they are based on our having visited a wide variety of types of LEAs in the United States. Of course, actual statements of frequency of occurrence (3 out of 16 LEAs) are explicitly limited to the LEAs we actually visited.

Content of the Report

SRI's findings concerning trends in the implementation of specific aspects of PL 94-142 are summarized in the following two sections. First (Section II), we examine trends in the implementation of the procedural and training aspects of PL 94-142 over the last 4 years. In the first two subsections of Section II, we describe the "Child Find" activities that local education agencies have conducted to identify, locate, and evaluate all children in need of special education, and prereferral screening and intervention activities to provide "high-risk" children with supportive services in the regular classroom. In the next five subsections, we discuss trends in other procedural provisions of PL 94-142: parent notice and consent requirements, multidisciplinary evaluation and reevaluation, IEPs, one aspect (i.e., mainstreaming) of the least restrictive environment provision, and due process hearing activity. Finally, we address the trends in LEAs' provision of training.

In Section III, we address changes in the scope and comprehensiveness of special education and related services. LEA-level trends in the provision of special education and related services to all handicapped children are examined. We also discuss some changes related to the LRE provision of the law, in particular changes in the continuum of placement options and in LRE decisionmaking, as well as changes in settings.

In Section IV, we present a discussion of the general sequence of the implementation of PL 94-142, as well as describe the variation in this sequence. In Section V, we present the overall effects of PL 94-142 on local education agencies. First, we discuss the effects of PL 94-142 on special education systems. Next, we discuss the general effects of the law

on specific role groups (i.e., LEA administrators, school personnel, parents, and children), as well as the trade-off between regular and special education. Finally, we present a discussion of the overall positive and negative effects of PL 94-142. In Section VI, we present a discussion of the factors affecting the implementation of PL 94-142. In addition, we present findings regarding the importance of the federal law relative to other factors (e.g., state law and regulations, court cases) that have affected LEA special education systems over the last 4 years. Finally, we discuss the interaction of these factors.

II TRENDS IN THE IMPLEMENTATION OF SPECIFIC ASPECTS OF PL 94-142 OVER THE LAST FOUR YEARS: PROCEDURES AND TRAINING

This section describes the trends at the local level in the implementation of the procedural and training aspects of PL 94-142 over the last 4 years. It covers the following topics:

- The "Child Find" activities that local education agencies (LEAs) have conducted to identify, locate, and evaluate all children in need of special education.
- Prereferral screening and intervention, which are activities to intervene before children are referred to special education and to provide "high risk" children with supportive services in the regular classroom.
- The parent notice and consent requirements of the law.
- Trends in multidisciplinary evaluation and reevaluation.
- Trends in individualized education program (IEP) practices and parents' involvement in educational decisionmaking about their children.
- The least restrictive environment (LRE) provision of the law, particularly trends in mainstreaming over the last 4 years.
- Due process procedures and hearings.
- Trends in inservice training and personnel roles.

Child Find Activities

PL 94-142 requires that LEAs identify, locate, and evaluate all children within their jurisdiction who are handicapped and in need of special education. When we visited the school districts in our study during

the 1978-79 school year, we found that most of the LEAs were conducting some form of Child Find activities, including in-school screening efforts. That is, they were using some informal or formal procedures (e.g., Kindergarten screening tests) to find unidentified handicapped children. At that time, Child Find activities were often guided by federal and state efforts under PL 93-380 (the Education for All Handicapped Children Act, to which PL 94-142 was an amendment). In California, for example, the state education agency (SEA) set up a formal "Search and Serve" effort in the mid-1970s.

For the most part, the nature of Child Find activities has changed little over the past 4 years. Basically, such efforts have been media campaigns designed to inform the general public that out-of-school handicapped children have a right to receive special education and related services (SEARS) and that they should be brought to the attention of the schools. These efforts have focused primarily on the identification of preschool-age handicapped children.

Although Child Find remained an important part of most LEAs' special education systems over time, administrators in most districts gave less time and attention to Child Find by 1981-82, largely because such activities had become more systematic or formalized over the years. Nevertheless, we found two sites this year in which special education administrators placed greater emphasis on Child Find activities. One LEA special education director, in response to SEA monitoring in 1980-81, assigned the task of coordinating a new Child Find effort to one of the special education coordinators. At the time of our site visit, the coordinator was planning a more formal procedure that would take advantage of the district's already developed computer system. In the other LEA, Child Find activities had occurred over the years, but they were described as being "hit or miss." With funds from an SEA Title VI-B grant, the district hired a part-time Child Find coordinator in 1981-82 to carry out Child Find efforts and goals on a more systematic basis.

Problems in the Implementation of Child Find Activities

Overall, most LEAs in the SRI study had few problems implementing the Child Find provision of PL 94-142. Basically, they refined or formalized the Child Find activities in which they had already been involved. By 1981-82, such activities had become an accepted part of district operations in most cases.

Effects of Child Find Activities

Public awareness of handicapping conditions and of available programs has been increased through various Child Find informational efforts. For the most part, however, with the exception of preschoolers, very few children have been identified through such activities. Most children continue to enter the special education system through the in-school referral process after they have participated in regular classroom activities. Although Child Find efforts in general did not discover a large number of unidentified children between 5 and 21 years of age, by 1981-82 more preschoolers were served in at least four districts because of Child Find efforts.

Prereferral Screening and Intervention Activities

Over the past 4 years, we have observed an increase in the use of prereferral screening and intervention activities in the study sites. Primarily, this increase has occurred at the elementary level rather than at the secondary level. These activities have been designed to decrease the number of inappropriate referrals and thereby to reduce the number of referrals to special education generally. Although not a specific provision of PL 94-142, such activities support the intent of the law not to misclassify children and to retain children in the regular classroom with supportive services. However, prereferral screening and intervention

activities can also serve the purposes of LEAs to control overreferrals to the number of available slots in their special education programs.

In 1979-80, we reported that about half the LEAs had increased their prereferral screening and intervention strategies. In 1980-81, the overall pattern showed no large increase in the emphasis on prereferral intervention. The most prominent exceptions to this general pattern were the LEAs that are subject to California's Master Plan for Special Education; because of a change in Master Plan regulations in 1980-81, there was further emphasis on prereferral intervention in these sites.

By 1981-82, all but three districts were conducting informal or formal prereferral intervention activities. Some LEAs merely required regular teachers to document interventions that had been attempted with a student; others routinely provided specialists to work with regular classroom teachers or had school-based assessment teams available to consult with teachers. Three LEAs had no prereferral screening and intervention strategies primarily because LEA personnel saw no need for them. Two rural districts had experienced no problem with overreferrals to special education; therefore, LEA administrators saw no need to initiate prereferral screening and intervention strategies. In the third district, a large urban LEA, the special education service delivery system has expanded rapidly over the past 4 years. The district continues to be in a good financial position and is able to meet the needs of additional children who may be identified as being in need of SEARS. As the LEA special education director commented, "We don't find more than we have capacity for, but we have a hell of a capacity."

Five districts expanded their prescreening intervention efforts between 1980-81 and 1981-82 for a variety of state-level and local reasons. In one district, for example, SEA monitors in 1980-81 found that special education referrals within the district were not being processed either appropriately or on time. Although the LEA had intended to address the inappropriate referral problem for some time, it was given priority in 1981-82 as a result of the SEA monitoring. In the fall, the district set up "prereferral

screening teams" across the LEA. These teams, consisting of the building principal, psychologist, social worker, nurse, speech therapist, and regular teachers, meet on a regular basis in all the elementary schools. Teachers or parents who have concerns about a child's behavior or academic progress can request that the prereferral screening team discuss the student's case. The team is designed to provide support to regular teachers to help them resolve problems.

Another district, which was already conducting prereferral screening and intervention efforts required under California's Master Plan for Special Education, increased its emphasis on these activities in 1981-82 because of a more rapid decline in state special education funding, growing class sizes, and continuing inappropriate referrals. The LEA set up "child study teams" in each elementary school to explore alternatives within regular education that can be used for children with learning problems. The district plans to expand this concept to the secondary level when possible.

A third district put more emphasis on prereferral intervention strategies in 1981-82 because of the high referral rate in the LEA. Two pilot projects were designed to cope with this problem. Two intervention teams (composed of psychologist, guidance counselor, and social worker) were created to develop strategies at several schools. Two additional psychologists were working with teachers at two other schools to help them utilize regular education resources to serve children with mild learning problems.

More direct prereferral intervention activities were being carried out in 1981-82 in a fourth district. Although the LEA had been conducting screening efforts under state law for several years, there was more of a conscious effort to decrease referrals because of cuts in special education staff, increased class sizes, and backlogs. In 1981-82, psychologists and resource room teachers were more involved in prereferral intervention activities at the building level.

Finally, in anticipation of shrinking resources, administrators in a fifth district encouraged regular teachers to try alternative classroom approaches before referral to special education. The diagnostic prescriptive teacher at the elementary level tried to spend time with most of the regular teachers so that she could suggest intervention strategies.

Over time, three LEAs decreased their emphasis on prereferral intervention. In 1980-81, we reported that two of these LEAs had deemphasized prereferral intervention in response to outside pressures (i.e., a court case and SEP monitoring). The third district had devised systemwide teams of itinerant resource teachers 4 years ago to serve as a prereferral intervention mechanism. These teams were very successful in working with regular teachers to try alternative strategies with children with learning problems. However, fiscal constraints have necessitated the reduction of these itinerant personnel. In addition, because of the SEA's greater emphasis on monitoring and records, LEA administrators have shifted their priorities for the use of the personnel. They are now used primarily as record keepers and record monitors. According to special education administrators, this shift was unfortunate, particularly because by 1981-82 there was a great need for itinerant resource teachers to help regular teachers deal with all the children with learning problems who were no longer eligible for special education under revised state definitions. Nevertheless, the LEA hoped to find some funds in 1982-83 to serve these children better.

Problems in Implementing Prereferral Screening and Intervention Activities

Prereferral screening and intervention activities are not a procedural requirement of PL 94-142. Such activities arose primarily out of special education practices at the time that the federal law came into existence. We have noted the evolution of these activities over time because they support the intent of the law not to misclassify children and to retain children in the regular classroom with supportive services. Most of the

study sites have implemented prereferral screening and intervention strategies without many problems. However, implementation has been difficult in the absence of extensive support and/or inservice training for regular teachers.

Effects of Prereferral Screening and Intervention Activities

In general, the major effect of prereferral screening and intervention activities has been the reduction of inappropriate referrals to special education. Such efforts also have helped to ease backlogs at the initial evaluation stage. In one district, for example, 70% to 80% of the children referred to special education now qualify, compared with 50% when we visited this district initially. Overall, it seems that LEAs are better able to support children who have learning problems in the regular classroom with supportive services than they were 4 years ago.

Parent Notice and Consent Procedures

PL 94-142 requires that the parents or guardians of a child be notified in writing when any action is proposed regarding their child and special educational services. Specifically, parents must be notified a reasonable time in advance of any action (or refusal to act) concerning their child's identification, evaluation, or placement. In addition, parents must be notified of their rights, and their consent must be obtained before the child undergoes any initial evaluation or is assigned to an initial placement. The purpose of these requirements is, at a minimum, to protect the rights of children and their parents in decisions regarding SEARS. They are also intended to encourage and facilitate parental involvement, one of the values underlying the goals of the law.

In 1978-79, we found that, for the most part, parent notice and consent procedures were in place in the LEAs participating in the SRI study. Most districts had met their legal obligation to involve parents in decisions

concerning their children. That is, forms and procedures had been designed or modified for informing parents of their legal rights, for notifying them about actions taken regarding their children, and for obtaining their signed consent to these actions. The forms used by LEAs varied, particularly in tone and format. However, with few exceptions, the forms did contain most of the necessary factual information, partly because most LEAs used the federal regulations or state guidelines as the basis for developing or modifying their forms.

With parent notice and consent procedures in place, we found an increase in the number of contacts between parents and schools in 1978-79. However, this did not necessarily mean that parental consent to school actions was "informed" or that parents were making substantive contributions to educational decisionmaking. Because each community had its own set of traditions surrounding the relationships between parents and schools, changing the ways in which parents and schools work together would clearly take time.

Few changes have been made since parent notice and consent procedures were instituted in 1978-79. Several districts have made minor changes in forms or procedures in response to SEA monitoring over the past 4 years, but no major changes have occurred. These procedures have been refined so that they are now well established in most of the LEAs.

Problems in Implementing Parent Notice and Consent Procedures

For the most part, LEAs implemented PL 94-142's parent notice and consent requirements without much difficulty. However, the increased paperwork associated with these procedures has been a complaint in most of the study sites. As one principal indicated: "There is too much red tape. We try to cut down forms and stay within the law, but it's just paperwork, paperwork, paperwork." Moreover, in some LEAs, much professional time has been spent on complying with these procedural requirements. For example,

securing parent signatures can be especially time consuming if parents are apathetic about their child's educational program.

Overall, most parents in urban and suburban areas readily accepted any additional forms required by parent notice and consent procedures. As one special education director noted, "It's the American way of life to sign forms." However, parents and administrators in most of the rural areas initially resisted the increased formality of notice and consent forms because they had relied on more informal interactions with each other. Over time, most people have accepted more formal procedures.

Effects of Parent Notice and Consent Procedures

For the most part, the law's intent to protect the rights of children and their parents in decisions regarding SEARS has been accomplished. LEAs have tightened their notice and consent procedures in response to PL 94-142, so that it is a rare occurrence that parents are not informed of LEA actions regarding their child. As one special education teacher commented: "Notice and consent procedures smooth the process...let parents know each stage their child goes through. The procedures are time consuming, but they reduce antagonisms and therefore they're beneficial."

Although LEA and school personnel could not assess whether parents have become truly informed about their rights, it does seem that parents have become more aware of their rights and/or better informed about the nature of their child's special education program over the last 4 years. In districts where parents are better educated, this awareness has been heightened by the law's notice and consent requirements. As one LEA special education administrator commented: "Now, parents are tremendously aware of their rights, and they are very vocal about any concerns that they have."

Multidisciplinary Evaluation and Reevaluation

Section 612(5)(C) of PL 94-142 and the existing regulations require that a multidisciplinary approach be used in evaluating children with potential need of special education. Provisions of the law are intended to prevent erroneous classification, identify all of a child's needs for SEARS, and periodically determine whether he/she still needs special education. Thus, the law requires that a variety of nondiscriminatory, validated measures be used (including those tailored to assess specific areas of educational need, as well as those providing indices of general intelligence), so that no single test score or procedure is used as the sole criterion for placement into special education. The current regulatory provisions also require that an evaluation be conducted by a multidisciplinary team or group of persons appropriately qualified to do so. In making placement decisions, this group must include persons knowledgeable about the child, the meaning of the evaluation data, and the program options. Finally, the regulations require that every child receiving SEARS be reevaluated (using procedures meeting the same requirements) at least every 3 years.

Multidisciplinary Evaluation

Even before the passage of PL 94-142, trends were consistent with the major requirements of the law: (1) use of a variety of assessments, (2) involvement of a variety of people, and (3) use of an assessment battery tailored for the individual's skills and deficiencies. We saw manifestations of this broadened approach to evaluating children for special education in nearly every LEA we visited in 1978-79. That is, in many ways, PL 94-142 and its regulations supported what had become good practice in many districts across the nation.

The most noticeable changes in evaluation practices during the 1978-79 school year were found in those sites where court decisions addressed

evaluation issues. The influence of court cases on evaluation practices had lessened by 1980-81. By that time, most LEAs affected by PARC v. Pennsylvania, Larry P. v. Riles, and Mattie T. v. Holladay had made the mandatory changes. For example, in response to PARC v. Pennsylvania, one large urban district designed and implemented a school-based assessment model that incorporates multidisciplinary evaluation practices. California districts affected by Larry P. v. Riles tended to classify children only rarely as educable mentally retarded (EMR), and/or they did not use IQ tests as the sole criterion for EMR placement. Finally, the Mississippi site affected by Mattie T. v. Holladay shortened timelines between referral and placement and instituted multidisciplinary evaluations.

The major other external factor influencing evaluation practices by 1980-81 was the state education agency. Although the changes demanded by the SEAs varied, they mainly concerned refinement in existing evaluation practices. No consistent pattern was evident in what the states emphasized; perhaps each state simply reacted to areas of weakness within individual LEAs.

During the 1981-82 school year, SEAs in three states influenced LEA evaluation practices. One SEA had monitored two of the study sites in 1980-81 and had asked that corrective actions be taken. In response to the monitoring report, one LEA began to address directly its traditional reliance on the psychologist's "bag of tricks." In 1981-82, a new role--supervisor of psychologists--was created to help change the traditional role of the psychologist as the dominant figure in the evaluation process. The supervisor held an inservice training session on multidisciplinary evaluation in Fall 1981 and has encouraged the psychologists to request more input from other team members and to use more discretion in the variety of tests administered. By Spring 1982, we found that psychologists were beginning to use such discretion by including language tests for children with weak verbal skills and adaptive behavior scales for borderline EMR students. The other district in this state

developed a new consent form for evaluations in response to the SEA monitoring. Now evaluators must list all the tests that will be used in a child's case study evaluation.

Another SEA incorporated a new requirement under its state law that a student must exhibit a "severe" discrepancy between performance and ability to qualify for a specific learning disabled (SLD) placement. Although one LEA interpreted this requirement to mean that psychological tests (as well as educational) now need to be given to students being considered for resource room placement, the other study sites in this state developed criteria for severe discrepancy. The purpose of the requirement was to slow the special education population's growth by tightening eligibility criteria.

In contrast, the third SEA dropped a processing/strength requirement from its SLD eligibility criteria because it was believed that too many students were being found ineligible for SLD services across the state. The study site affected by this change was trying to clarify the eligibility criteria for school personnel to use in determining eligibility for special education this year.

Except when stimulated by external factors such as the courts or federal/SEA monitoring, most LEAs initiated little change in evaluation practices in response to PL 94-142, although they have refined such practices over the past 4 years. Primarily, the purpose of these refinements was either to streamline procedures or to pay greater attention to the individual needs of handicapped children. For example, one LEA initiated a new screening team in 1980-81 to provide better assessment of nonverbal students. This year, the LEA increased its use of the services of a regional screening team to help accelerate the evaluation process. Although most LEAs had emphasized individually tailored evaluations by 1981-82, the availability of resources, as well as eligibility criteria, continued to have a strong influence on decisionmaking concerning student placement.

Reevaluations

When we initially visited the study sites in 1978-79, we found that, although every LEA acknowledged an awareness of PL 94-142's mandate for a 3-year reevaluation, reevaluation was given relatively little time and attention. The lack of emphasis on reevaluations by assessment personnel was the result of the existing burden of initial evaluations. This situation has continued, except in sites where external factors (e.g., court cases, SEA monitoring) have highlighted reevaluation backlogs. Various LEA attempts to reduce backlogs in response to outside forces are described in the next subsection.

For the most part, reevaluations tended to be as comprehensive as initial evaluations. Because few of the study sites had systematically conducted formal reevaluations before PL 94-142, this requirement was a problem for most districts in the sample. Several LEAs developed coping strategies such as hiring more evaluation personnel and streamlining the reevaluation process (e.g., differential testing, shortening the test battery), but by 1981-82 reevaluations remained an overall problem, largely because of the increased number of referrals for initial evaluation.

Despite the problems encountered in keeping up with the 3-year reevaluation requirement, the general quality of reevaluations has improved. For example, in a district that had given comprehensive 3-year reevaluations only to EMR students before PL 94-142, all special education students now receive comprehensive 3-year reevaluations. The director of the guidance department acknowledged that the concept of comprehensive reevaluations is good practice, but said it is difficult to implement when initial referrals have increased and funds are inadequate to hire additional evaluation personnel.

Problems in Implementing Multidisciplinary Evaluation Requirements

In general, most LEAs had few problems implementing the multidisciplinary/nondiscriminatory evaluation provision of PL 94-142. Because multidisciplinary evaluation already was considered to be good practice, the law did not introduce a new concept; rather, it reinforced a trend that had already begun.

LEA and school personnel mentioned some problems, however. The major problem associated with implementing the multidisciplinary evaluation provision was backlogs at the initial evaluation, placement, and reevaluation stages of the special education system.* We describe the backlog situation below.

Initial Evaluation and Placement Backlogs

In 1978-79, we found that, in all the study sites, limits in available services and in staff trained to conduct evaluations resulted in backlogs of children awaiting evaluation or placement, or both. It seemed clear at that time that merely adding more evaluation personnel and imposing timelines would not solve the problem of backlogs, because as soon as more children were identified, special education and related services had to be expanded or a backlog would occur at the placement stage. By 1979-80, both initial evaluation and placement backlogs had been reduced effectively by LEAs' adding evaluation personnel and expanding services. Where available resources did not permit expansion, the backlogs were alleviated to some extent by using other strategies, such as increasing class sizes. Although actions to reduce backlogs received continued emphasis in the LEAs in 1980-81, the majority of the districts still had backlogs, primarily at the

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*Backlogs refer to children waiting to be evaluated initially, waiting for a special education placement, or waiting for 3-year reevaluations.

evaluation stage. The most common strategy to address the backlog problem continued to be hiring additional evaluation personnel. Fewer LEAs expanded SEARS to accommodate more special education students. Placement backlogs were less frequent than those for evaluation, but they were a problem in a few sites.

Although the backlog situation changed little between 1980-81 and 1981-82, the overall pattern over the past 4 years has been a gradual improvement of LEAs' capacity to deal with initial evaluation and placement backlogs. However, in three urban districts serving large special education populations, backlogs have continued to be a persistent problem because these systems cannot absorb the large number of children with special needs. Even with an increased evaluation staff, one of these districts has been unable to keep up (e.g., there were approximately 3,000 referrals outstanding in 1980-81). Despite expansion of services every year, there still are not enough program slots because of lack of space and the LEA's inability to obtain trained personnel. In another urban district, many actions have been taken to reduce initial evaluation and placement backlogs, largely in response to a court decision. Despite the hiring of additional evaluation personnel and expanding SEARS each year since the passage of PL 94-142, backlogs still existed in 1981-82, primarily at the initial evaluation stage. Program expansion was very limited this year because of funding cutbacks, and evaluation resources were used for reevaluations. Moreover, a local teachers' strike disrupted district operations at the beginning of the school year, and there was less time to process children into the system.

The third district made some progress on initial evaluation backlogs this year by allocating more resources; however, this LEA's placement backlog situation grew worse because budget cutbacks resulted in fewer resource room placements. Given the decreasing financial resources at the local and state levels, there was little optimism that the situation would change in the future.

Finally, two other LEAs experienced placement backlogs in 1981-82. Placement backlogs for SLD services persisted in a fourth urban LEA despite program expansion to serve a continually increasing SLD population. In a suburban district that had been adversely affected by a state funding formula in 1980-81, placement backlogs increased in 1981-82 because of staff cuts.

Reevaluation Backlogs

Our general finding over the past 4 years has been that the requirement to complete reevaluations of special education students every 3 years also resulted in backlogs. By 1979-80, the study sites were just beginning to address their reevaluation backlogs, most often by hiring more evaluation personnel, by reallocating staff resources, or by making the reevaluation process more systematic. Although reevaluation backlogs have remained a problem in at least half the LEAs over time, their alleviation has received less emphasis than initial evaluation or placement backlogs.

In 1980-81, only four LEAs directly addressed reevaluation backlogs, in response to either compliance concerns or SEA monitoring. In 1981-82, three districts addressed reevaluation backlogs, largely in response to the external pressure of SEA monitoring. A rural district responded to a corrective action requirement of the SEA by assigning its new supervisors for the psychologists and the SLD/EMR/SED (seriously emotionally disturbed) program as monitors of the reevaluation process. The backlog problem seemed to be more under control as a result, and several special education teachers commented that it was easier to get reevaluations done promptly this year.

Two large urban districts allocated resources to improving the reevaluation problem this year; they made some progress, but their backlog problem is still large. One of these sites is the one financially constrained LEA that has had an increasing problem with backlogs for several years. As discussed in previous reports, because the local mental health agency that has the responsibility for conducting psychological reevaluations has several funding sources, it must meet numerous demands

other than providing services for the school district and, therefore, is slow to conduct reevaluations. The SEA monitor required the district to reevaluate several thousand children by May 30, 1981, or risk having state funds withheld. The district responded by locating $100,000 within its local budget to reevaluate children. The mental health agency used its own staff and hired additional personnel to work "nights, weekends, and vacations." Using a shortened version of the standard test battery, they completed about 1,650 reevaluations by the deadline. In 1981-82, in an effort to keep up with the reevaluation problem, the district allocated an additional $130,000 to the effort. The improvement in the reevaluation backlog problem has been noticed at the school level. Several special education teachers commented that the mental health agency now even asked for children to reevaluate. This was a dramatic change from 1980-81, when teachers could not even receive a reevaluation request form promptly from the agency.

Thus, over the years we have seen that LEAs place relatively little emphasis on reevaluation backlogs, except when outside pressure highlights the problem. Once such backlogs are highlighted, however, the districts have tended to address the problem directly.

Other Implementation Problems Experienced by LEAs

Other implementation problems with the multidisciplinary evaluation provision were less common. Nevertheless, three problems should be noted here.

First, resistance to changing the role of the psychologist often made implementing a multidisciplinary approach more difficult. In many places, traditionally the psychologist had been the sole evaluator--or at least the arbiter--of eligibility criteria to whom other school and district staff deferred. By 1981-82, the traditional model persisted to some extent in a few sites, especially the rural ones where there often were no other specialized personnel who might perform assessment functions.

Second, there were implementation problems in the few districts that actually had to restructure their entire evaluation systems, largely in response to court cases. For example, a large urban district had to restructure its entire evaluation system to implement a referral-to-placement model. Initially, there was great resistance to the amount and complexity of the increased paperwork required. Scheduling the multidisciplinary team meetings to include all the appropriate staff members, as well as the parents, was a "logistic nightmare." Staff who had never formally communicated with each other before had to learn how to act as a team. Nevertheless, within 3 years the model was commended by the SEA monitoring team, and school personnel generally had accepted and even liked the local decisionmaking process.

Finally, the lack of clarity in state SLD eligibility criteria was noted as a problem. For example, one urban LEA faced with this type of vague state criteria had difficulties in determining who should be served by special education. Shrinking state and local resources forced the issue; thus, many LEA administrators and evaluation personnel spent much time and effort in creating and revising their own SLD eligibility guidelines.

In general, by 1981-82 the multidisciplinary approach to evaluation was well established in the majority of the study sites.

Effects of Multidisciplinary Evaluation Requirements

For the most part, the effects of PL 94-142's multidisciplinary evaluation requirements are perceived as positive by LEA administrators and education professionals at the local level. More individuals with different roles relative to children have been involved in the evaluation process than before; as a result, evaluations have become more comprehensive. One high school SLD teacher commented that she believed that requiring the opinions of "all sorts of professionals makes you look at all angles of a child at the multidisciplinary staffing conferences. It takes time, but it's worthwhile and needed because it makes you examine the child more closely."

In general, children probably have benefited by being appropriately classified and placed more often because of more comprehensive evaluations and the wider variety of tests that have been used.

Although both the availability of resources and the (associated) narrowness or expansiveness of eligibility criteria remain major factors influencing decisions concerning student identification and placement, it appears that children are less likely to be erroneously classified today than they were 4 years ago. Special educators in one urban district, where misclassification had been a major problem in the past, unanimously agreed that implementing their referral-to-placement model had been worthwhile because children are much more likely to be better assessed now and to receive an appropriate special education program than they were in the past.

The negative effects of the law's evaluation provisions were perceived to be the increased paperwork burden that developed as LEAs formalized the multidisciplinary evaluation process and the time-consuming nature of involvement in such an evaluation process. In a few sites, school personnel noted that having more comprehensive evaluations sometimes meant more rather than fewer delays in the provision of SEARS. However, they also agreed that children are better served as a result of more appropriate assessments.

IEP Practices and Parental Involvement in School-Level Decisionmaking

PL 94-142 and its accompanying regulations require that each child who receives special education and related services must have a written individualized education program (IEP). This IEP is to be developed in a meeting that includes certain school staff, the child's parent(s), and the child, if appropriate. It is to be developed before placement in special education and the delivery of SEARS. The document must include:

> (a) a statement of the child's present levels of educational performance; (b) a statement of annual goals, including short-term instructional objectives; (c) a statement of the specific special education and related services to be provided to the child, and the

extent to which the child will be able to participate in regular educational programs; (d) the projected dates for initiation of services and the anticipated duration of the services; and (e) appropriate objective criteria and evaluation procedures and schedules for determining, on at least an annual basis, whether the short-term instructional objectives are being achieved. (300a.346)

Over the last 4 years, we have investigated the implementation of the IEP provision at the local level. In this subsection, we first discuss changes in IEP practices and then discuss parental involvement in the IEP process and educational decisionmaking. Finally, we describe the problems LEAs had in implementing this provision, as well as discuss the overall effects of the IEP provision.

IEP Practices

The regulations implementing Part B of PL 94-142 required IEPs to be in place by October 1, 1977. We found that, in response to this requirement, the major activity in all the study sites in the 1978-79 school year was oriented around the implementation of the IEP process, particularly to develop the written IEP document or to adapt to the IEP process. This activity clearly dominated educators' attention because the IEP (and its required forms and procedures) was a new requirement for LEAs; even LEAs that previously had some form of individualized plan for children had to make some procedural changes to meet the requirements of the law. In 1978-79, we found generally that IEP meetings had been held, that they included the required participants, and that IEP documents had been developed for handicapped children and signed by parents.

Once the IEP forms and procedures were in place, LEAs and school-level personnel made some changes and refinements. IEPs, as originally implemented, took a great deal of time and energy. Over the last few years, the major changes concerning IEPs have involved reducing this burden (the perceived burden of teachers is discussed later). These changes have involved two types: (1) the refinement and streamlining of the IEP process and the IEP form, and (2) the broadening of the IEP short-term objectives.

They have been motivated by factors internal to the LEAs, as well as by external influences from the state and federal levels.

One change we have seen over the last several years has involved the refinement and streamlining of the IEP process and form to reduce unnecessary burden. These changes generally have been internally motivated; administrators or service delivery personnel have developed shortcuts for the procedures and forms, while still preserving their intent. Thus, in 1979-80, we reported that some sites had devised shortcuts such as the following:

- The compilation of curriculum guidelines for each disability area, providing a list of long- and short-term objectives from which to draw.
- The development (by a boundary crosser*) of checklists to help develop annual and short-term goals. These made the boundary crosser "a tad more efficient" and enabled her to individualize each child's program "without writing a book on each kid."
- Shortening the IEP form to the minimum required by the federal regulations.
- Color-coding the IEP form to indicate whether the short-term goals had been met.
- Using computerized systems to help determine the goals to be achieved, based on test results.

Streamlining of procedures and forms continued into the 1980-81 and 1981-82 school years. For example, in 1980-81 we found that the director of special education in a small site streamlined the IEP process by limiting the number of short-term objectives to three. This change, at the director's initiative, was an attempt to reduce paperwork and to reassure teachers that they did not have to specify every detail in writing IEPs. In 1981-82, we saw further streamlining efforts such as:

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*The role of boundary crossers is to minimize the barriers associated with the organizational boundary between regular and special education. This role is discussed at the end of this section in "Changes in Personnel Roles."

- In one rural site, the IEP updates are now done on the date the student entered special education, rather than all at the end of the year. This change was an attempt to stagger the paperwork burden.

- In an urban site, the IEP form was condensed so that it was easier and less repetitious. In addition, it was put on NCR paper, so that a copy could be torn off easily for parents. Previously, much time was taken up in finding copy facilities when a copy was needed.

- Several years ago, a suburban site had devised an elaborate documentation system in which teachers had to indicate when short-term objectives were mastered and to generate new objectives. In 1981-1982, in an effort to cut down on paperwork and streamline the IEP process, teachers were told that it was no longer necessary to continue with this elaborate documentation and update process.

In addition, several sites have plans for further streamlining of the IEP form and procedures. The most common plan involves the use of computers to assist in the writing of the IEPs; in fact, at least five of the LEAs in the SRI study, including rural areas, suburbs, and big cities, are looking into computerized IEPs. For example, one suburban site plans to put IEPs on a word processor, and goals and objectives will be taken from a prepared list.

The second major type of change in IEP practices has involved broadening the IEP short-term objectives (as well as changing when the short-term objectives are written). These changes, which mainly occurred in the last 2 years, have been motivated by both external and internal factors, as described below.

When IEPs were first implemented, the short-term objectives were generally written by the receiving teacher after placement, and they were quite specific. For example, in 1978-79 we reported that, in all but three sites, the short-term objectives were left for the receiving teacher to write. This procedure was justified on the grounds that the teacher needed to become acquainted with the child before being able to develop realistic, concrete goals. However, in January 1981 the Secretary of Education issued an interpretation of the IEP requirements under PL 94-142. As part of this interpretation, the Department of Education reiterated that IEP objectives

(also called short-term objectives) must be written before a child is placed in special education. The department also stated that the IEP is not intended to be detailed enough to be used as an instructional plan. The following distinction was made in this regard:

> IEP objectives provide general benchmarks for determining progress toward meeting the annual goals. These objectives should be projected to be accomplished over an extended period of time (e.g., an entire school quarter or semester). On the other hand, the objectives in classroom instructional plans deal with more specific outcomes that are to be accomplished on a daily, weekly, or monthly basis.*

Given this clarification, it was interesting to find that the major changes in IEP practices observed in Spring 1981 were related to when short-term objectives were written and to the nature of these objectives themselves. In a few LEAs in three states participating in the SRI study, recent SEP or SEA monitoring had an impact on completing the IEP (including short-term objectives) in a one-step process before placement. In addition, there was a pattern, in over half the LEAs, toward writing broader short-term objectives, making the IEP less like an instructional lesson plan. Although the reasons for this latter change varied, most commonly it was made in response to SEP or SEA monitoring or state directives. However, internal factors also sometimes motivated this change toward broader objectives--for example, a desire on the part of teachers to make the objectives more understandable to parents.

In the 1981-82 school year, several LEAs continued to broaden their short-term objectives, in response to both internal and external factors. The best example comes from one state where the SEA has pushed LEAs to write the IEP at the placement team meetings, as well as to write broader short-term objectives. In one small LEA in this state, the short-term objectives became broader last year in response to the SEA pressure. For example, instead of writing "learn -ed and -ing endings" or "learn

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*Federal Register (Vol. 46, No. 12), January 19, 1981.

contractions," short-term objectives were more like "increase decoding skills by one level" or "increase reading skills by one level." This year, the special education director pushed for even broader short-term objectives, both because of the state's emphasis and because the special education director had a heightened concern for accountability raised by this district's first due process hearing. As an elementary school teacher said, "Last year we could say 'increase one grade level in reading.' Now it's just 'increase reading'...so we're not liable." A high school teacher added that his short-term objectives are "to enhance reading skills," "to enhance vocational skills," and so forth. In fact, the short-term objectives in this district are even broader than those suggested by the SEA. For example, state-level personnel felt that short-term objectives such as "to increase reading" are too general for objectives---"it would be on everyone's IEP...[teaching reading is] the name of the game."

As noted last year, there have been some exceptions to this general trend of the broadening of short-term objectives, again motivated by both external and internal factors. For example, in response to a court case, one LEA made a greater effort in 1980-81 to improve programming for its SMR population; as part of this effort, IEPs for these children became more specific and were 10 to 12 pages long. Another district, motivated by the LEA's concern for teacher accountability, also made its IEPs more detailed; the major change was the addition of an IEP insert, a sep[illegible]et containing short-term objectives that are updated every 6 w[illegible]

Parental Involvement in School-Level Decisionmaking

Over the last 4 years, we have studied parental involvement in the IEP process and the degree to which parents actively participate in educational decisionmaking. PL 94-142 contains procedures which provide parental involvement and requires schools to invite parents to participate in the decisionmaking process concerning their children. This presumes that parental involvement will improve the quality of decisions made about their children or, at the very least, guard against the school's taking

inappropriate actions. Below, we discuss changes in the amount of parental participation, as well as in the quality of parental input, over the last 4 years.

In general, overall parental involvement and satisfaction, although not necessarily linked, varied greatly over the last 4 years, both within and between districts. Some of the factors that influenced both the quantity and quality of parental involvement, as well as parental satisfaction, included:

- History and traditions of particular communities (e.g., the level of parents' expectations, knowledge of the law and special education programming, parents' attitudes toward the schools).
- Demographic characteristics of neighborhoods (e.g., the lack of personal contacts in large urban areas, the inaccessibility of remote rural areas).
- The policy established by the principal or a handful of teachers at a particular school, as well as across the LEA, by the administration (e.g., the quality of dialogue between parents and school personnel, the degree of flexibility of parties in resolving differences of opinion).
- Individual family concerns; parents' personalities and personal history.

Factors outside the local context have also influenced parental involvement to some extent. These factors include desegregation orders (e.g., cross-town busing makes parent-school meetings more difficult), SEA monitoring, and court decisions.

Within this framework of variation in parental involvement, we have observed several changes in the level of involvement that were caused by PL 94-142 over the last 4 years. The major area of change has been in the quantity of parental involvement: the amount of parental involvement significantly increased immediately after the implementation of the federal law, but then leveled off over time.

Thus, in 1978-79 we found that most schools had met their legal obligation to involve parents in decisions concerning their children. As

described earlier in this section, notice and consent procedures had been developed. LEAs generally made a great effort to ensure that as many parents as possible attended meetings, and meetings generally were scheduled to accommodate parents (e.g., making arrangements to accommodate working parents). Thus, the number of parent-school contacts increased significantly in that year as a result of PL 94-142. Since that time, the amount of parental involvement has remained essentially the same. This overall change was summed up by an administrator in a site with traditionally high parental participation: "There is more parent participation; before, we would meet without them if they didn't want to come. But now, we make sure the parent is there."

This year, we observed an interesting exception to the trend that the increase in parental participation had leveled off. This exception illustrates the possible effects of budgetary and programmatic cutbacks. In an urban site where recent cutbacks in special education had caused some mildly handicapped children to be decertified from special education, teachers reported that more parents were coming to the meetings at the schools, at least in part because of the fear that their handicapped children might also be dropped from special education unless they showed up to advocate for them.

This increase in the amount of parental participation relative to 4 years ago was apparent both in sites where parental involvement has historically been high and in sites where it has historically been low. However, even with this increase, the variation among sites in the quantity of participation remains the most striking feature. For example, in some sites with historically little parent-school interaction, district administrators and school personnel may still make special efforts to encourage parents to attend meetings, but few will come; in sites with traditionally high parental involvement, most parents come in regardless of whether LEA and school personnel make any special effort.

Over the last 4 years, we have continued to find that the amount of parental participation is less at the secondary level than at the elementary level. Although variation occurs across districts, some of the reasons for this situation include:

- A limited number of initial placements are made at the secondary level.
- Parents expect students to take more responsibility for themselves; schools also expect more of the decisions about programs to be made by the students. At the secondary level, teenage children often do not want their parents to advocate for them.
- High schools take fewer steps to actively involve parents in decisionmaking.
- Parents have been through the process at the elementary level and either trust the schools or have become apathetic or frustrated with the process.

Although PL 94-142 appears to have increased the quantity of parent-school interaction, it had a smaller effect on the quality of those interactions. That is, there is now more dialogue between parents and school personnel about the child's medical history, home environment, and the like. However, parents still do not make substantive contributions to the educational decisionmaking process regarding their children (i.e., contributions significantly affecting decisions concerning appropriate programs and services for their children). At IEP meetings they tend to trust the placement and services recommended by school personnel. This lack of involvement can be due to many factors. For example, parents have limited information about options, and many feel intimidated about questioning school authorities or expressing their views in front of highly trained specialists. Also, parents are often put in a reactive position (especially during IEP meetings), because the specialists often have met before and made some preliminary decisions about their children. Some parents are not intimidated but abstain from contributing to the decisions because they believe that the decision is the appropriate responsibility of school personnel; they genuinely trust that the school staff are "experts" who know what is best for their child (which may, in fact, be true much of

the time). In some cases, a lack of contribution may reflect parental apathy or constraints on their ability to participate, such as lack of a formal education.

A further problem is that the amount of time school staff can (and will) devote to involving each parent with all the necessary specific issues concerning the child's programming is limited. In addition, school-level personnel generally do not want parents dictating specific substantive issues, such as curriculum. For these reasons, few districts have made concerted efforts to encourage substantive contributions. In addition, most parent groups, and parent training provided by LEAs or organized by advocacy groups, do not seem to be directly oriented toward increasing parents' ability to discuss their children's programs substantively. In the few cases where we have seen efforts by LEA staff to increase substantive contributions over the last few years, they have generally had little effect. For example:

- At a high school in a rural LEA, a counselor first meets with parents alone as they come into the placement meeting, to tell them what the meeting will be about and to try to lessen any feelings of intimidation. However, even though the parents may talk more under these conditions, they do not seem to make more substantive contributions as a result.

- In another rural district, the special education director has gone out of her way to encourage parental participation. For example, she tries to make the meeting informal, tells an anecdote about each professional, tries to make parents feel comfortable, and tries not to intimidate parents. However, even with this effort, parents do not make substantive comments. The school psychologist faced a similar situation. She used to be "keen" about asking parents what they wanted their child to learn. However, she always got the same answer--"I want him to learn" or "I want him to learn to read." Because her efforts seemed to be futile, she now just tends to ask whether the parents concur with her recommendations.

Even in areas where parents tend to be more actively involved with the schools, efforts to obtain more substantive contributions from parents generally have not succeeded. For example, in a site where parents are viewed as extremely active, one teacher noted that, at most, only 5% of parents will ask for things--"95% will never ask for anything."

In sum, the amount of parent-school contact has increased since the passage of PL 94-142, primarily in the early years of the implementation of the law. In addition, there is now more communication between parents and school personnel about children. However, the assumption that an increase in the quantity of parent-school interaction will greatly increase the quality of interaction cannot be supported. Because of the nature of schools and parents (as well as a lack of parent training and skills), parents tend not to make substantive contributions to the educational decisionmaking about their children (i.e., their contributions do not significantly alter the decisions about appropriate programs and services). One might wonder, then, what the effect of the increased parental contact and communication has been. In general, the major effect of this involvement has not been on children's programming; rather, the largest effect has been on the parents. Parents are now more aware of what their children are doing, and there is more communication between parents and the schools, both in districts with historically active parents and in districts with historically inactive parents.

Problems in Implementing the IEP Provision

In general, there was an initial flurry of activity in LEAs to implement the IEP provision of PL 94-142, and LEAs faced many problems with the provision:

- Many LEAs had to make major changes in procedures and develop new forms.
- The IEP process required a great deal of time and energy from many local personnel.
- LEAs found it difficult to achieve substantial parental involvement in the IEP process.
- There was a great deal of uncertainty surrounding the IEP document itself; for example, many personnel were unclear as to the required level of detail of the IEP.

However, over the last 4 years, IEP procedures and forms have become incorporated as routine practice in LEAs. In addition, the procedures and forms have been refined and streamlined, although the requirements are still viewed as burdensome (see the following subsection). The IEP process now has become an accepted part of the job of special educators. In 1981-82, local personnel made the following comments illustrating this acceptance:

- They [IEPs] now require less energy because the system is in place by now.
- [IEPs are] second nature to us all now.
- I'm getting used to it now....It was overwhelming at first [but] we're adjusting.
- Now it's more taken for granted.

Effects of the IEP Provision

In general, respondents felt that the IEP provision (i.e., the IEP process as well as the IEP document) has had major effects on special education teachers, children, and parents. In general, the effects on special education teachers seem to have been primarily negative, but IEPs have benefited children and parents. The effects of the IEP provision on each of these groups are discussed below.

Special Education Teachers

The major impact of the IEP provision on school-level personnel has been an increased time and paperwork burden. Over the last 4 years, teachers and support staff have resented the extra time spent on coordination, planning, meetings, and paperwork, which decreased the time they could devote to delivering services to students. However, the perceived burden has decreased in each of the last 4 years.

In 1978-79, we reported that the implementation of PL 94-142's IEP requirements consumed more time for more staff than any other procedure required under the law. We also found that many school-level personnel felt that the total amount of time spent in scheduling and attending meetings, as well as in writing IEPs, was great enough to significantly lessen the time left for instruction and other service delivery. Each year since then, we have found that, in most LEAs we studied, the IEP process has been perceived as becoming easier and taking less time. This lessening of burden has resulted from such factors as the following:

- In many sites, forms did not change over the 4 years, and personnel became increasingly familiar with and adept at using them.
- Personnel got used to the IEP process and knew what to expect; they did not have to start from "ground zero."
- Teachers and administrators developed shortcuts to the IEP process (described earlier).
- In many sites, the goals for the IEPs became broader and thus easier to write (described earlier).
- A larger percentage of the IEPs to be written were just updates, rather than initial IEPs.
- Teachers began to consider IEPs as a routine part of their jobs. In addition, beginning teachers learned about IEPs in their preservice training and brought this knowledge to the LEAs.

The exceptions to this trend of decreasing burden occurred in the few places where there were major changes in the IEP process or where procedural changes required school personnel to do more work. One interesting exception in 1981-82 illustrates the potential effects of fiscal limitations. In an urban site with severe budgetary constraints, teachers were no longer provided with substitute teachers to permit them time to write IEPs and hold parent conferences. This cutback could greatly increase the burden on teachers, as well as undermine the IEP process. Teachers were advised by their union not to update IEPs unless the district restored the substitutes. Several special education teachers interviewed had not updated their IEPs at the time of our visit and were not sure whether they would follow the union's advice. One teacher said that he was told "off the

record" by his supervisor to simply change the cover sheet (not the goals) if he wanted to, but that he "damn well better have something that looks updated."

Although special education teachers generally have felt that the burden of IEPs and the associated effect on service delivery time have decreased over the last 4 years, they still feel that IEPs take up a great deal of time and energy. Despite the routine use of IEPs, a teacher consultant in a suburban district remarked this year that "teachers still find it to be a tremendous, time consuming burden."

Even though IEPs may be burdensome to school-level personnel, we have observed that this burden is sometimes balanced with their usefulness. Over the last 4 years, we have reported various uses of IEPs. In general, IEPs have not been used as a daily instructional guide (consistent with SEP's interpretation), particularly as the IEP short-term objectives have become broader (see discussion earlier in this section). When teachers use IEPs, they use them more for planning, organizing, and documenting individuals' progress; in particular, they seem to be used more and perceived as more useful by new teachers. However, many teachers profess that IEPs are not useful even for these purposes. A common sentiment is that "writing an IEP is not equivalent to teaching a kid." That is, whether teachers have no IEPs, specific IEPs, or general IEPs may not make a difference in terms of instructional services. For example, a counselor in a small LEA said, "Good teachers do it anyway, and for bad teachers, IEPs do not make a difference." A teacher in a large urban district said:

> I'll tell you my bias. [IEPs] have not had much of an effect [other than] lots of paperwork--but then there are also teachers who are good at paperwork and not teaching--you get "pat" goals--you can get by--if you're a good teacher, it [the IEP] is not going to make you better, and if you're a bad teacher, it's not going to make you better.

In addition, a teacher in an urban site said, "Good teachers will do something like them anyway, only they will take less time."

To some extent, both the burden and the usefulness of the IEP for teachers may depend on the type of IEP. In sites where the IEP short-term objectives have become very specific, there is agreement that the burden is tremendous; however, these IEPs are viewed as more useful. For example, in a site with IEP "inserts" containing very specific short-term objectives that are updated every 6 weeks, teachers have said that they spend "every minute" on paperwork; however, the insert is easily kept and referred to in the classroom, and has helped teachers become more organized and keep up with children's progress. On the other hand, in sites where the IEP short-term objectives have become broader, it was generally agreed that the IEP was less burdensome; however, the IEP was also viewed as less useful as a daily instructional guide. For example, in one site where the IEP short-term objectives have become extremely broad this year (e.g., a short-term objective can be "to increase reading"), IEPs are nearly the same for all children; as one teacher said, IEPs have gotten so broad that she can just "jot it down." However, the increasing broadness of the goals has made them less and less useful. As one teacher remarked:

> At first I thought they were real effective; they wanted specific concepts and could be taught from and passed to the next grade for use by the next teacher. You could see exactly what kids knew and needed to know....Now we have made them so general that you can't teach from them....Why even do IEPs?

Another teacher added that they are "so vague as to be meaningless."

Children

Although IEPs may not have proven to be useful for teaching students (consistent with SEP's interpretation), school-level personnel tended to believe that children have benefited from the process of developing IEPs. That is, the major benefit to children has been that the IEP process forces school personnel in general, and the child's teacher in particular, to look at each individual child and consider his/her strengths and weaknesses; it makes every teacher, at least once a year, stop and consider again what is best for each child. For example, a psychologist said, "Although teachers

don't use IEPs for instruction....They are worthwhile. I'm all for them....They force us to look at the individual child and think about how to help him." Teachers agreed that this aspect of the IEP benefited children, even when they felt that the documents have not been useful in the actual teaching process and have created an unnecessary burden.

Parents

As reported earlier, parents generally have not made substantive contributions to the educational decisionmaking process surrounding the IEP provision; i.e., parents have not had a large impact on what programs and services are recommended on the IEP. However, it is generally agreed that the IEP process has had a large positive impact on parents. That is, the IEP process has proven to be a vehicle for parent-school communication, regardless of whether the IEP is a useful document. The following quotes illustrate this feeling:

> The meetings are important because we get to have a conference with the parent....We needn't have IEPs....It's an excuse (for the meeting).
>
> IEPs create parent contact....This is good....You can do more with a student with more parent contact.

This parent contact has made parents more aware of what their children are doing, as well as created more communication between parents and schools.

Overall Impact of the IEP Provision

In general, school-level personnel support the concept of an IEP. In particular, the IEP process can be useful as a method to consider each child as an individual and to encourage parent-school contact. However, because the procedures often are time-consuming and burdensome, they think that IEPs may not be worth the effort. In addition, when resources are tight, the IEP cannot guarantee services that the district cannot provide. We have often

reported that districts only recommend on the IEP those services that are available; as a special education supervisor said, "Trying to assure certain services and skills through IEPs is an effort in futility."

Least Restrictive Environment

Section 612(5)(B) of PL 94-142 and its existing regulations require procedures to assure that, to the maximum extent appropriate, handicapped children, including children in public or private institutions or other care facilities, are educated with children who are not handicapped, and that special classes, separate schooling, or other removal of handicapped children from the regular educational environment occurs "only when the nature or severity of the handicap is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily." To achieve this goal, the criterion of the least restrictive environment (LRE) is to be considered in making the initial decision to place a child in special education. Thus, PL 94-142 places the burden of proof on schools to justify removing a handicapped child from the regular classroom for special education. To place a child in a setting other than the regular classroom, staff must demonstrate that, even with support, a child cannot be appropriately served in the regular classroom.

During the SRI study, we have investigated the progress of LEAs in implementing the LRE provision of PL 94-142. Specifically, we have focused on the following:

- Changes that have occurred in the continuum of placement options in an LEA's jurisdiction.
- How LRE decisionmaking takes place.
- Changes in settings in which handicapped students are receiving services.
- Changes in mainstreaming activities.

We address the first three topics in Section III because they are more related to changes in the scope and comprehensiveness of special education and related services. In this subsection, we present findings related to changes in mainstreaming activities, an important school-level practice intended to foster mutual exposure of handicapped and nonhandicapped students in a manner consistent with the LRE provision of PL 94-142.

Mainstreaming Activities

During the early implementation of PL 94-142 (1978-79), we investigated mainstreaming activities in the study sites. We found that what was most typically referred to as "mainstreaming" consisted of either moving a group of children from a completely self-contained classroom to a regular classroom setting, usually for nonacademic activities and social exposure, or transferring individual children from a self-contained placement into regular classes for some academic instruction. This type of mainstreaming was common practice in many LEAs before the passage of PL 94-142 and has not been changed significantly by the law. Instead, PL 94-142 further legitimizes and boosts this already existing trend.

At the elementary level, mainstreaming for art, music, or recess was typically done on a group rather than an individualized basis. Mainstreaming for academic instruction, however, was typically determined on the basis of an individual child's ability to function at or near the level of nonhandicapped children in a specific content area. Another criterion teachers used to make mainstreaming decisions was the child's social acceptability* and his or her potential to disrupt the class. In most instances, it was the responsibility of the special educator to initiate the mainstreaming activity, which usually involved finding a willing regular education teacher who would agree to take the handicapped student for a portion of the school day.

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*For example, teachers often considered whether an older elementary-level student was too large physically to integrate socially with his or her achievement-level peers in a classroom.

Our initial attempts to determine whether mainstreaming was successful at the school level resulted in the identification of several facilitating factors:

- A supportive principal--At the elementary level, at least, the principal's understanding of the mainstreaming concept and support of staff actions to achieve appropriate integration facilitated mainstreaming.

- A good working relationship between individual regular and special education teachers--Special education teachers typically determined for themselves that a child was ready to join his or her nonhandicapped peers for certain subjects. These teachers attempted to find a regular classroom teacher who would be receptive to these students and willing to "try it out."

- Aides and assistants to support regular teachers--Aides and assistants were sometimes crucial for successful mainstreaming. As one regular educator commented: "Mainstreaming will rise or fall on the basis of backup or support."

- Boundary-crossing personnel--Such personnel work with both regular and special education teachers to ensure a coordinated program for individual children. (The role of the boundary crosser is discussed in detail later in this section under "Changes in Personnel Roles.")

SRI continued to investigate changes in mainstreaming activities as the implementation of PL 94-142 progressed. During 1979-80, our data continued to support our initial observations that mainstreaming was facilitated by the aforementioned factors. Additionally, we found that more mainstreaming was taking place at the school level, and in some instances it was becoming more individualized.

We also observed in 1979-80 that a number of strategies had been developed and often were being used in conjunction with boundary-crossing personnel to facilitate mainstreaming. For example:

- In one site, a notebook was carried by the special education student to his or her regular teacher, special education teacher, and parents as a device for coordinating his or her program.

- In the same district, an assignment sheet was used to aid regular and special education teachers, parents, and students in communicating about school expectations for special education students enrolled in the regular program.

- In a site that had encountered previous difficulty with mainstreaming because of large regular education classes, the special education coordinator assigned each self-contained special education student to a regular classroom teacher's class list before school started in the fall. This ensured that a special education student could be mainstreamed if that became an appropriate option, without the regular class size exceeding its maximum limit.

- In another district, a boundary crosser solved a controversy about grading mainstreamed students by distinguishing between "competitive" and "noncompetitive" mainstreaming. If a child was mainstreamed on a competitive basis, the regular teacher graded the child. If the child was mainstreamed on a noncompetitive basis, the special education teacher graded the child's progress on the outlined IEP objectives.

Despite the progress LEAs were making in refining mainstreaming practices, many special and regular educators indicated the need for better communication between staffs and the need for additional support for the handicapped child and for regular teachers in the mainstreaming situation. As one teacher said, "Mainstreaming helps alleviate some problems kids have, but if you don't give them the appropriate amount of help, they are hurt personally. That's why aides are helpful."

During the third year of the study (1980-81), we found no large change in the amount of mainstreaming at either the elementary or secondary level. New strategies to facilitate mainstreaming continued to be developed, and regular teachers continued to accept their expanded role vis-a-vis special education students, thus making mainstreaming easier to accomplish. In each of the LEAs we visited, mainstreaming activities continued on both group and individual bases. Increased efforts to place special education students in regular classes generally were found at the high school level and usually involved vocational education placements. In some sites this type of mainstreaming was facilitated by new boundary-crossing personnel whose job was to establish more formal means of coordination between special education and vocational education. These new personnel (such as a vocational education coordinator and a vocational advisor) facilitated the accessibility of regular vocational options for special education students.

During 1981-82, we again found very few changes in mainstreaming practices across the districts. However, two rural LEAs that historically had mainstreamed students only on a limited basis reported more mainstreaming at the secondary level. This change took place in one LEA because the secondary EMR class moved to the regular high school campus; previously, it had been located in a separate building about a mile from the high school. In the other LEA, mainstreaming increased because the guidance department took over the responsibility of scheduling special education students for their classes. Special education, in turn, became more "a part of the high school," and it became easier to mainstream the students (for example, they were mainstreamed into regular physical education classes for the first time).

In contrast, two additional LEAs, both of which had been mainstreaming students for years, reported less mainstreaming taking place in 1981-82. In one LEA that has the resources to provide adequate mainstreaming support to children and teachers, this change came about because more severely handicapped children are now being served in the self-contained classes. The other LEA is facing more difficulties with mainstreaming for a combination of reasons, including (1) increased class sizes, which are adversely affecting both special and regular education and making mainstreaming more difficult; and (2) stricter state eligibility criteria, which have resulted in the placement of students with severe learning problems in the self-contained setting.

Problems in Implementing Mainstreaming Activities

Several problems have arisen at the LEA level with regard to the implementation of mainstreaming activities. These include: (1) fiscal constraints, (2) attitudinal problems, and (3) coordination problems.

Fiscal constraints have inhibited several LEAs from providing regular educators with the kind of substantive inservice training needed to facilitate mainstreaming activities. For example, administrators in one

district said that implementing mainstreaming activities was much more difficult because they did not have the resources to mandate inservice for all regular educators. In this site, because of the presence of a strong union, teachers must either be paid additionally for attending inservice training or be provided with release time (which requires the hiring of substitute teachers). The cost of providing such training to all regular teachers countywide would have been prohibitive in this rural LEA. In another case, mainstreaming has received relatively little emphasis in a large urban school district that has put considerable effort into implementing other aspects of the LRE provision. According to the director of special education, this was a conscious decision on his part, made because regular education had recently suffered substantial budget cuts so that regular teachers faced large class sizes and had not been adequately trained to deal with handicapped students. He further commented:

> I feel we are going slow on mainstreaming....The assumption has been that something is going on in the regular class that handicapped children can benefit from. Well, maybe, but regular students aren't getting what they should sometimes. The expectation for regular teachers to deal with a full class plus handicapped students, without adequate training, is a crazy assumption.

Attitudes have also affected the ease with which mainstreaming takes place. Most sites reported that regular administrators' and educators' attitudes toward the handicapped have improved over the years; however, the willingness of a regular teacher to accept a mainstreamed student still seems to be an individual matter. In one large urban LEA in a state with special education legislation similar to PL 94-142, a major problem over the years has been building a resource base of supportive regular teachers to assist with mainstreaming efforts. Some teachers probably will never accept mainstreaming as a concept. As one principal commented: "Mainstreaming is only as good as the number of teachers who truly wish to support it." This belief was shared across most of the study sites.

The staff in two rural sites seemed to construe the LRE provision of PL 94-142 and mainstreaming in a rather narrow sense, and their concept of

"appropriate special education programming" has not changed significantly since the passage of PL 94-142. At least in part, this viewpoint seemed to be related to the traditional attitudes of staff (both special and regular educators and administrators) about what constitutes appropriate special education placement. They still seemed to prefer serving handicapped students in self-contained classes rather than resource rooms and to have serious reservations about the benefits of mainstreaming. As one SLD teacher commented: "Mainstreaming sounds terrific, but it doesn't work in reality....I don't like mainstreaming. I'm not sure if this has a good effect. Young kids need one teacher, stability, continuity." A principal further commented: "I'm not too much for mainstreaming....It's my worst complaint....If the regular teachers had 20 kids, then they could handle this; but with too many kids, the teachers can't handle it." Neither of these LEAs has greatly expanded its continuum of placement options, nor has either engaged in many other practices that would alter the way in which they make decisions.

Coordination problems related to mainstreaming also have occurred at the school level, particularly in LEAs without formal boundary crossers. Monitoring and follow-up of student progress in the regular classroom is considered important to effective mainstreaming. In sites where regular and special educators have little support (i.e., aides, personnel such as boundary crossers, etc.) for coordinating mainstreaming, the likelihood of the students' fully benefiting from the experience lessens, as does teacher satisfaction.

Effects of Mainstreaming Activities

LEA staff perceived the increase in mainstreaming efforts as having both positive and negative effects at the local level. Many LEA administrators and educators thought that handicapped students had benefited socially and academically by spending time in the regular class. In addition, they believed that the handicappped students' self-image had

improved. However, others were more cautious in lending their support to mainstreaming. They tended to think that, without consistent and systematic monitoring, special education students could get "lost in the shuffle" and lose ground academically. With increasing class loads and the day-to-day demands of teaching, it was often difficult for both regular and special educators to provide coordinated mainstreaming activities. The following quotes best illustrate these points:

- "If the kids are learning, then it's good....But if it's only to mainstream, then it's not good. We want kids to learn something. The regular teachers are not trained to deal with [some of] these kids....If mainstreaming is LRE, then I'm all for it."
- A high school teacher felt that mainstreaming was "very successful" with certain students "and that it was necessary...tremendous socialization."
- A teacher of the deaf and hearing impaired said, "Quite frankly, I think some special education students do get lost in the mainstreaming shuffle. I think some of these students may suffer academically even though some of the social strides might do something for self-image."

Due Process Procedures and Hearings

Under PL 94-142, LEAs have the responsibility to provide parents (or guardians) of handicapped children with an opportunity for an impartial due process hearing and the right of appeal. When we visited the study sites in the 1978-79 school year, we found that all the LEAs appeared to have informal dispute resolution, hearing, and appeal procedures in place. We also observed that many local factors influenced whether a dispute reached the due process hearing stage or was resolved earlier through less formal means.

The major factor was the nature of the disagreement; i.e., issues that tended to go to hearings were those in which the LEA believed that it should not or could not pay for the services that parents considered appropriate. Other factors included the presence of parent advocates or advocate groups

and the availability of mediation as a previous alternative. In particular, the history and general tone of parent-school relationships in a district, as well as the desire and capacity of individual LEA personnel to use informal dispute resolution procedures, appeared to be influential in all districts.

In general, most school district administrators in the LEAs studied have used informal dispute resolution to try to accommodate parental demands before a due process hearing. Over the past 4 years, LEA administrators have become more skillful in the use of informal dispute resolution strategies, such as negotiation and prehearing conferences. By 1980-81, various effective new strategies had been developed. For example, a suburban district allocated a half-time position for a paralegal consultant on due process hearings. This action was taken in 1980-81 to decrease the amount of high-level administrative time that had been spent on dispute resolution and preparing for due process hearings. We learned that most issues that reached the due process consultant this year had been resolved by her before going to a formal hearing. Although there had been no change in the number of complaints from demanding parents, the mediation approach used by the consultant was effective.

Although only seven LEAs had had more than one due process hearing as of May 1979, at least two of these districts each had more than 35 hearings in 1978-79. In LEAs that had a considerable number of due process hearings in the first year, the level of activity by 1979-80 was about the same or lower. By 1980-81, due process hearing activity was characterized as minimal in all the study sites. The gradual decline in due process hearings continued in 1981-82, during which hearings occurred in fewer than half the LEAs. As has been the case over time, hearings generally were over the issue of appropriate placement (especially private school placement) and related services. In the one LEA that experienced its first due process hearing in 1981-82 a parent objected to the district's recommendation that her child be served by homebound instruction, rather than in a trainable mentally retarded classroom within a junior high school. The hearing

officer determined that the LEA had an appropriate in-school program; the child is now back in school.

Although all but two districts have had some due process hearings over the past 4 years, hearing activity has tended to be more prevalent in urban or suburban sites with long-established special education programs. In general, it is still a small number of dissatisfied parents with above-average educational backgrounds and income levels who go through with due process hearings. Pursuing due process hearings is costly for parents, unless a parent advocate group is available to them. For the most part, LEAs have tended to win hearings. Although due process hearing decisions per se have not generally produced programmatic or systematic changes in LEA policy, they have caused some LEAs to focus more attention on programmatic gaps within their SEARS delivery systems, especially with regard to the provision of related services.

Attitudes regarding the fairness of hearings varied among districts; in several LEAs, advocates, parents, and LEA administrators questioned the impartiality of hearing officers. For example, advocates in one large district questioned the impartiality of hearing officers because they were often special education administrators from neighboring LEAs, a fact that the advocates believe biases them toward the LEA. In California, the impartiality of three-member hearing panels has been questioned across the state (i.e., LEAs thought the panels were biased toward parents and parents thought they were biased toward the LEAs). As a result, the state legislature passed a bill in 1979-80 that allowed parties to bypass local hearings and go directly to the SEA for a decision. In general, most LEA special education administrators seemed to agree that it is difficult to find a hearing officer who is considered impartial by everyone. As one special education director in an urban LEA commented: "Impartiality can end up meaning ignorance of special education." Thus, a hearing officer's ability to make appropriate decisions regarding a child's special education needs may be limited.

Despite the trend toward a declining number of formal due process hearings, there are still disagreements between parents and LEAs regarding placement and services. For example, the number of parents who objected to LEA actions increased in at least two districts in 1981-82. These urban LEAs, located in the same state, had to decertify a number of mildly handicapped children this year because the state had dropped several handicapping categories (not included in PL 94-142) from its state law. Parents in both districts were upset that their children were now in regular education without supportive services. As one teacher commented: "The district is getting all sorts of flak from parents."

For the most part, districts continue to rely on the informal dispute resolution strategies they have created over time. We noted in 1978-79 that two (out of nine) states required LEAs to use techniques that resemble mediation procedures. As the study sites in these states have refined their informal dispute resolution strategies over the past 4 years, they have become more effective in resolving disagreements with parents. This year, one other state established a state mediation system. In the one study site that had used a state mediator, LEA administrators were positive about the new system. One of them described the mediator's role as that of "an active listener." In one child's case the district, parents, and mediator agreed to an independent educational evaluation, at LEA expense, using an evaluator chosen jointly by the LEA and the parents.

Problems in Implementing Due Process Procedures

Although most districts had to modify or tighten their due process procedures in response to PL 94-142 requirements, there generally were no major problems in implementing these requirements. As noted earlier, we found that all the LEAs we studied had informal dispute resolution, hearing, and appeal procedures in place during 1978-79. These procedures are now firmly established and internalized within the LEA systems.

Effects of Due Process Procedures

For the most part, the impact of PL 94-142's due process requirements on LEA administrators has lessened over time as they have adjusted district policy and procedures to comply with the law. The greater number of hearings in the early years of implementation were costly for administrators in terms of time, fees, and inconvenience. As one district superintendent commented this year: "We had to get savvy on how to handle due process....Now it's almost a yawn....It's time consuming, but it doesn't dominate our lives." In general, the primary impact on LEA administrators has been to make them more conscientious in dealing with parents. That is, LEA administrators and personnel are generally much more aware than before of the need to inform parents of their rights and to discuss problems with parents so that issues can be resolved through informal dispute resolution. For example, in one large urban district, it was apparent by 1981-82 that the LEA had become much more responsive to parents, especially vocal parents, as a result of PL 94-142's due process provision and associated court decisions.

Due process hearing decisions and/or court decisions have helped to clarify LEA fiscal and legal border-of-responsibility issues, especially with regard to the provision of related services. Although we often heard initially that the school-parent relationship was being damaged by the adversarial nature of due process hearings, it appears that this relationship has improved over time as both parents and LEA personnel have worked out solutions to their problems on a more informal basis. Parents still want the "best" possible services for their children, but they are becoming more aware of the realities of school district budget cuts and limited resources. Hearings also have made administrators and teachers more cautious in their IEP recommendations because of legal implications.

Due process procedures have enabled parents to exercise their rights under PL 94-142. As we indicated earlier, parents who have exercised their rights to a due process hearing have primarily been those with above-average educational backgrounds and income levels. Where class action suits have

occurred, both parents and their handicapped children have benefited from the additional services that have been provided.

Thus, although disagreements between parents and schools concerning the meaning of "appropriateness" continue to exist after 4 years, the mechanisms available to resolve these disagreements are more effective than they were before PL 94-142.

Comprehensive System of Personnel Development/Inservice Training and Changes in Personnel Roles

To achieve the goals of PL 94-142, LEAs needed to train local personnel in all requirements of the law. For example, to adapt to PL 94-142's procedural requirements, as well as to adjust to new or revised responsibilities, some inservice training had to occur. In addition, roles of individuals changed and new types of personnel had to be added. These topics are discussed below.

Inservice Training

PL 94-142 recognized the need for training educational personnel to adapt to new responsibilities in order to implement the law's goals. Each state was required to develop a comprehensive system of personnel development (CSPD) in which LEAs were to participate. This system also was to include inservice training of district and school personnel, which in most of the study sites was carried out by the LEAs. Over the years, the emphasis placed on inservice training has fluctuated somewhat because of local and state influences, but, in general, inservice training has not received great emphasis in school districts as a result of PL 94-142 requirements.*

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*One of the reasons PL 94-142 had little impact on inservice efforts is that some LEAs already had well-established special education personnel development programs before the law was enacted, so that little additional effort was needed.

When we visited the school districts included in the SRI study during the 1978-79 school year, we found that all except one had some special education inservice training regarding PL 94-142 implementation. This training was offered primarily to special education administrative and teaching staff. Much of the training offered was strictly an orientation to the law and generally was procedural. It was not perceived as being directly relevant or applicable to staff problems (all groups expressed the need for more preparation to meet the expectations of their roles under the new law). Two factors appeared to influence this state of affairs: (1) inservice received relatively little emphasis in LEAs that had to implement new programs and related services, change procedures, and create new roles; and (2) training initially had to be oriented toward implementing the new procedures and requirements rather than toward more substantive topics.

By 1979-80, there was little change in the amount of inservice training or in the emphasis given to it, but there were indications that training was better coordinated and more directly addressed staff problems and detailed substantive issues. A number of factors appeared to have facilitated the move toward more relevant inservice sessions, including: (1) the addition of school- and district-level personnel who could provide formal or informal training, as well as provide support to regular education personnel, (2) the creation or expansion of inservice coordinator roles, and (3) adequate coverage of procedural matters in past sessions.

Although the amount of inservice training did not change significantly in the majority of sites in the last two school years (1980-81 and 1981-82), there were some minor changes. Several LEAs increased or decreased their levels of inservice training as a result of local factors (such as lack of money or more pressing concerns) and SEA influences (such as legislative changes or additional funding provided to LEAs for staff development). For example, in the 1981-82 school year, six LEAs had less inservice training than the previous year, primarily because of decreases in funding (a combination of cutbacks in local and state levels). On the other hand, five LEAs reported increased or improved inservice training efforts because of

increased state inservice requirements, improved needs assessment practices, and the addition of an administrative position that incorporated more hands-on assistance to teachers. In addition, more collaborative training initiatives (e.g., between special and vocational education at the secondary level) began in 1980-81 and continued in the 1981-82 school year.

Changes in SEA Involvement

In 1979-80, we inquired about the role of the state in providing and fostering inservice training at the local level and appraised local perceptions of the state's comprehensive system of personnel development. We found that states used various mechanisms (e.g., regional resource centers, state grants, requirements that LEAs spend a percentage of their PL 94-142 flow-through funds on inservice training) to implement their comprehensive system of personnel development. LEA personnel in most study sites generally considered SEA-sponsored training to be of limited utility because of its general nature (i.e., topics were not relevant to the specific needs of individual LEAs, and LEAs had difficulty coordinating with the SEA system). Little changed in 1980-81 in the mechanisms that most states used to implement personnel development or in the frequency with which LEAs took adv ntage of SEA training. There were, however, two significant exceptions.

Two SEAs, through changes in legislation and funding mechanisms, influenced the level or quality of inservice training in their LEAs beginning in 1980-81 and continuing in 1981-82. The first state included in its new special education legislation the requirement that LEAs provide inservice training to all regular education teachers who serve special education students. LEAs chose to implement this requirement in a variety of ways that have met with mixed reviews from educational personnel. While the state legislature was encouraging LEAs to expand their inservice efforts, local school districts were facing severe budget cuts, which was discouraging an expansion of training initiatives for the future.

The other state made legislative changes in 1980-81, not only in personnel development requirements but also in how funds were allocated to this function. A new state law was passed that required educators to receive 15 hours of inservice credit each year to maintain their certification. This mandated inservice training can involve local inservice sessions, university courses, attending state meetings, and so forth. Additional funds were allocated to LEAs to implement the new law. The SEA also changed its allocation procedures for funds to implement the state's comprehensive system of personnel development. In 1979-80, the SEA had allocated PL 94-142 discretionary funds to regional service centers for the provision of inservice training to LEAs. In 1980-81, the SEA merely funneled the funds through the regional centers, thus allowing LEAs to conduct their own special education inservice training. The changes in legislation and funding allocations got LEAs to sponsor more inservice sessions but have not really increased attendance because participants did not consider the sessions very useful.

Problems in Implementing the CSPD Provision

LEA attempts at inservice training were either facilitated or inhibited by various factors. In a large rural district, personnel development has remained a high priority for the district's administrators (the county PL 94-142 coordinator also enjoys planning and conducting inservice sessions). Despite the positive attitudes of the administrators, however, the county staff cited lack of authority to require inservice training for all staff and lack of money as the biggest constraints on fully implementing staff development and making overall implementation of PL 94-142 a smoother process. One administrator stated: "We couldn't mandate inservice for everyone. We tried, but the unions got in the way. Teachers are not committed to inservice. We could do more if we had authority and/or money." Because of budget cuts in the last two years, the county has had little money to carry out inservice sessions or provide substitutes so that teachers could attend training. But even with increased authority to mandate inservice training and funding, there is no guarantee that attendance will increase, as discussed previously.

One of the large urban sites also has placed a high priority on personnel development since the passage of PL 94-142. Several factors contributed to this situation: (1) the administration has always had a commitment to staff development, (2) the SEA required that LEAs spend a portion of their PL 94-142 funds on training, (3) local advocate groups pushed for increased training, and (4) state monitors pointed out the need for more training for particular role groups. Again, despite all these positive forces for increased personnel development, there has been little positive impact. Money is tight; the special education system has had to undergo great changes because of its involvement in court cases; and staff have had to deal with more problems than just special education. As one LEA administrator commented: "Fiscal difficulty, low morale...everyone is sitting back and waiting for an axe to fall."

Budget constraints were a common problem among the study sites in 1981-82, and inservice training appeared to be one of the victims of this situation. LEAs were trying to maintain programs and services to students; therefore, staff develpment was an item that they could no longer afford. This attitude was expressed by a principal in another large urban district: "There is too much inservice...too many people coming and going...funds could be better applied directly to classroom assistance."

Although progress has been made in better informing staff about special education procedures and practices, there was still concern that regular education personnel were not adequately prepared to deal with special education students. The director of special education in one district commented:

> Over the years this continues to be the most frustrating area to deal with. We have done an adequate job telling them [regular educators] about the law, but we have not been too successful changing attitudes toward special education kids....[I'm] not sure more formal inservice will help....[We are] still frustrated about how to do this.

Over the last 4 years, we have found that sites with personnel who can provide hands-on assistance to school-level staff are considered to provide

more relevant training. Several districts have employed on-site trainers through various means--persons we have called boundary crossers whose job includes formal and informal training of on-site personnel; mainstreaming aides, who have helped facilitate the transmission of special education practices to regular education teachers with mainstreamed students; and a team of systemwide itinerant teachers, who trained school-based teams to provide ongoing inservice training for the rest of the faculty. Unfortunately, some of these roles have also been victims of budget cuts or have had to change their focus because of other pressing demands (e.g., the itinerant resource teachers are now primarily monitoring records because of the increased emphasis the SEA has placed on documentation and the monitoring of forms).

In general, it is clear that the concept of staff development in the area of special education was well in place before the passage of PL 94-142. Despite efforts to carry out the law's intent, there is little perceived impact of the CSPD provision. The reasons for this overall lack of success seem to involve a number of factors that have relegated most inservice training to an ineffective role. Some of the factors that we have observed at the LEA level have been discussed above and can be summarized as follows:

- Diminishing resources.
- Many other demands on regular education staff.
- Few incentives for staff attendance (e.g., sessions held after school hours, no release time, no reimbursement).
- Union restrictions.
- Lack of perceived relevance of inservice topics.
- Constant changes in special education procedures.
- Low teacher morale.
- Outside pressures creating more pressing demands (e.g., monitoring requirements, the courts, legislative changes).

Effects of the CSPD Provision

Although inservice training did not become a high priority as a result of PL 94-142's CSPD requirements, one should not conclude that the law had no effect on inservice efforts. Local perceptions were that the CSPD provision resulted in the following benefits:

- Teachers and administrators were better informed regarding special education.
- Special education departments have had more money to spend on inservice training and providing technical assistance to teachers. As one administrator commented when asked about the district's inservice efforts: "We always thought this was fairly good, but it's gotten better under Master Plan and PL 94-142, because we received more money."
- Inservice was conducted more systematically.

Despite the need for more inservice training, teachers perceived little increase in the level of training provided in the LEAs that SRI has studied. Although there were increased efforts directed toward personnel development, participants saw no significant effects over the last 4 years as a result of these efforts. There seems to be no clear pattern explaining why this state of affairs has emerged, but it has left some administrators very frustrated and disheartened.

Changes in Personnel Roles

In 1978-79, we expected to find the roles of various personnel undergoing changes as a result of PL 94-142. For the most part, we found that the psychologist's role was one that changed significantly. We saw that assessment no longer was the exclusive province of psychologists; rather there was more educational assessment and a correspondingly larger

role for the educational diagnostician (this change was consistent with a greater emphasis on multidisciplinary evaluation practices).* However, PL 94-142's primary impact on the psychologist's role was to increase the percentage of time spent on testing children relative to counseling or other service delivery activities.

Principals and other regular education personnel generally reported that they were more aware of the district's special education programs, but their roles did not change to any great extent. And even with some increases in mainstreaming, there was not much change in the day-to-day delivery of special education services at the school level (i.e., the interaction between regular and special education personnel). On the other hand, in nearly half the sites we found the creation of new roles or the expansion of old roles that we have labeled "boundary crossers."

The use of boundary crossers is one strategy developed by LEAs to cope with the limitations imposed by the organizational barriers that frequently exist between regular and special education. The boundry crossers' job is to facilitate the coordination between special and regular education that is required for activities such as mainstreaming and IEP development and use. Their role has had a significant effect in minimizing barriers to the implementation of PL 94-142. A prime example is the expanding role of the diagnostic prescriptive teacher, such as the resource specialist created under California's Master Plan for Special Education.

Under the Master Plan, resource specialists provide individually appropriate instruction for learning handicapped children through a partly

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*The traditional role of the psychologist is still fairly dominant in districts with a small special education staff.

instructional, partly coordinating role. In addition to their instructional responsibilities,* resource specialists:

- Provide inservice training for school staffs.
- Provide consultation services and materials for regular classroom teachers.
- Act as a liaison with teachers of self-contained special education classes to expedite successful integration of students.
- Coordinate placement and IEP meetings.

In 1979-80, we found expansion in both the number and types of boundary crossers. Most of these boundary crossers were at the elementary level, but we did find a few in the secondary-level programs as well. By 1980-81, though, the main increase in the number of boundary-crossing personnel was at the secondary level, primarily because of the increased coordination between special education and vocational education (in the past this coordination usually was done informally). For example, in one medium-size LEA that had previous success with boundary-crossing personnel, the role of the vocational education coordinator was developed in an effort to provide more vocational opportunities for its special education students. This position, paid for through vocational education 10% set-aside funds, was the outgrowth of an agreement between the special education department and the vocational education department on how vocational education was to carry out its mandate to serve special education students. The vocational education coordinator's primary focus is to assist self-contained special education students, and his time is spent (1) gathering assessment data to be used in placing special education students in vocational programs, (2) seeking out receptive vocational education teachers for student placement, (3) acting as a liaison between vocational and special education (providing assistance to

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*The resource specialists' role has been changed over the last 2 years through new credentialing requirements. Their role in the evaluation process has been decreased so that they can spend more time providing instructional services.

vocational education teachers, such as tutoring and counseling of special education students and providing inservice training to vocational teachers), and (4) finding jobs for students.

In addition to boundary-crossing roles, nine other new roles or functions became evident during the 1980-81 school year (most of these were related to changes at the LEA administrative level). These new roles were created in response to various local problems, such as discipline of special education students, inappropriate changes in placement, and monitoring of students in private placements. Outside influences, such as SEA monitoring and court cases, accounted for half of these new roles, which were created to deal with bilingual assessments, services to non-public-school students, and program development for SMR students.

Despite the minimal growth in the number of special education personnel this past school year (1981-82) and budgetary constraints, at least six LEAs continued to try to meet local needs by creating two new roles and modifying six others. These new or revised roles and the needs they addressed include:

- Teachers who provide more direct services to secondary mildly handicapped students.
- A teacher to work with parents of autistic children on behavior control and the prescreening of students referred to the autistic program.
- A resource consultant who provides feedback to regular education teachers who have mainstreamed hearing-impaired students in their classroom.
- A team of special education teachers who work with school personnel to help them cope with the changes in special education that have resulted from changes in state law, the requirements of PL 94-142, and the localization of special education services instituted by the LEA.
- A coordinator who organizes child find activities and works with teachers and students to help them deal with mainstreamed students (a role made possible by an SEA grant).

In short, the growth of special education programs and the changes in special education practices influenced by PL 94-142 have affected the personnel who serve handicapped students: their numbers have grown over the past 4 years, and many roles have been created or modified to meet the changing demands of special education programming. One of the most pressing demands has been the need for coordination between regular and special education personnel, which has given rise to boundary crossers who can facilitate this coordination. Given the increasingly difficult fiscal constraints facing school districts, it is questionable whether LEAs will be able to continue to employ new personnel or even to maintain those they now have to meet the needs of the handicapped.*

*According to SEP (1982), states have projected a continued need for increasing the number of available special education teachers and related services personnel in the future.

III TRENDS IN THE IMPLEMENTATION OF SPECIFIC ASPECTS OF PL 94-142 OVER THE LAST FOUR YEARS: SCOPE AND COMPREHENSIVENESS OF SPECIAL EDUCATION AND RELATED SERVICES

PL 94-142 and its accompanying regulations require the provision of a free appropriate public education to all handicapped children aged 3 to 21.* In this section, we discuss the trends and changes that we have found in the provision of special education and related services over the past 4 years. The section covers the following topics:

- An overview of changes in the provision of special education and related services; these findings are presented primarily in terms of age range (i.e., preschool, elementary, secondary, 18 to 21) and handicapping conditions served. We also discuss changes in programs and services to non-public-school children, as well as changes in private school placements, and describe changes in the provision of related services. The problems that LEAs have encountered in implementing the SEARS mandate and the major effects of the mandate are also discussed.

- Changes related to the LRE provision of the law. Included in this discussion are changes in the continuum of placement options and in LRE decisionmaking, as well as changes in settings. Problems associated with implementing these aspects of the LRE provision, as well as the major effects of the LRE provision, are also included.

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*Unless these age requirements are inconsistent with state law or practice, or the order of any court, respecting public education within such age groups in the state.

Changes in the Provision of Special Education and Related Services (SEARS)

Programmatic Changes by Age

Preschool Programs

One of the anticipated effects of PL 94-142 was that it would increase the age span of the children to which LEAs offered special education and related services and that preschool children therefore would benefit. When we visited the study sites in the 1978-79 school year, we found that approximately half the districts were already providing programs and services to young children, but two-thirds of them increased the number of programs and services to accommodate additional preschool children in that school year. Over the past 4 years in the majority of the LEAs, federal flow-through funds, as well as PL 94-142 preschool incentive grants, have facilitated the development of new programs for previously unserved preschool children or the expansion and refinement of existing programs. About half the study sites used federal or state resources to include younger children within the range of preschool children whom they serve. For the most part, these districts chose to include the 0 to 3 age range within their service delivery systems.

During 1981-82, there was little change in preschool programs. One large LEA expanded programs to younger trainable mentally retarded (TMR) and orthopedically handicapped (OH) children (3-year-olds).* Another district, in addition to slightly expanding programs to 3- to 5-year-olds in its preschool program, used PL 94-142 discretionary funds to start a parent-infant program for 0- to 3-year-olds. The program is designed to reach infants and toddlers whose development is delayed and to train parents to help their children's growth. However, the program's future was in jeopardy at the time of our site visit because of anticipated cuts in

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* State law mandates programs to the population aged 5 to 18.

PL 94-142 discretionary funds. District administrators were hopeful that, if there are budget cutbacks, they may be able to have parents pay some of the cost of maintaining this program.

In summary, we have observed a gradual increase over the past 4 years in the number of preschool children who receive SEARS. In addition to serving more 3- to 5-year-olds, about half of the districts used federal or state resources to include the population aged 0 to 3 within the range of preschool children whom they serve.

Elementary School Programs

Programmatic growth at the elementary level peaked in the 1979-80 school year, when existing programs expanded and several new programs were introduced. Although this expansion included programs for a number of different handicapping conditions, increasing programs for SLD students was a major target area in more than half the study sites. In 1980-81, limited program expansion characterized the situation at the elementary level in about half the LEAs. We also found that growth in SLD programs had leveled off, in some instances because LEAs continued to tighten SLD eligibility criteria. The limited program expansion affected primarily SLD, SED, and EMR students.

Although overall programmatic growth continued to slow in 1981-82, several districts were able to fill a few existing gaps in their special education service delivery systems at the elementary level. Primarily, these LEAs focused on expanding SEARS to their SLD, SED, EMR, and OH populations. Two large LEAs located in Sunbelt states have not been subject to resource limitations as yet. This year, one of these districts expanded programs to more SED, EMR, and OH children, largely in response to availability of additional classroom space (aided by construction money received from the SEA) and a change in leadership, and in accordance with continuing implementation of an SEA-developed policy of phased service

expansion. The LEA continued creating more SED placements on school sites (e.g., placement of more resource and self-contained SED classes on the grounds of regular schools). In addition, the developmental EMR program added some classes. Finally, the OH program expanded by opening up a second center for the orthopedically handicapped at a regular elementary school. The other district, which has an increasing SLD population and a decreasing EMR population, added one SLD class and reassigned some EMR teachers to teach SLD part time.

Four LEAs added a small number of classes at the elementary level. Primarily in response to a consent decree and PL 94-142, one district continued to expand its SLD and SED programs slightly by adding one class to each program. Steady growth over the last 4 years has been facilitated by changes in the state funding formula, but more rapid growth has been inhibited by the LEA's inability to find qualified staff. Although the district has the second highest pay scale in the state, it is far below what LEAs in other states can offer.

Two other districts each added one class for the mildly handicapped. Because of cuts in the special education budget, district administrators in one of these LEAs were able to add only one class, although they acknowledged that more were needed. They also increased class size across the district to provide programs to as many children as possible. However, some teachers were concerned that the increased class size hampered meeting the individual needs of children. The other LEA, a small rural site that relies heavily on state and federal money to supplement its limited local resources, used part of its PL 94-142 funds to add an EMR class at the K-1 level, thus filling the last basic gap in the district's primary EMR program.

Finally, in response to parental pressure, a suburban district began operating a new OH program to serve children with disabilities that include cerebral palsy, spina bifida, muscular disorders, and genetic disorders affecting sight, speech, and ambulation. These children had been served previously through a regional OH program housed in a neighboring district.

Parents' complaints that their children should be served closer to home prompted the district's board to agree to operate its own program, even though it is more costly to do so.

In contrast to this programmatic growth at the elementary level, four sites had cuts in programs and personnel this year. State and local factors primarily accounted for these cutbacks. Three of these sites were in one state, where new special education regulations in effect in 1981-82 deleted three mildly handicapped categories from state law to make it more consistent with PL 94-142 mandates.* In response to this SEA action, a large LEA that has experienced increasing financial constraints over the past 4 years was forced to cut $3 million from its special education budget. As a result, 139 special education teachers and 69 aides had to be reassigned to regular education or laid off. These personnel were primarily resource room teachers. In addition, all of the resource room and self-contained classroom aides were lost in the district's special education program. Although the impact on the provision of SEARS to children was greater at the secondary level, many elementary school children were also affected. The district made a massive effort to recertify as many children as were eligible as SLD, but many children were being inappropriately served or were receiving no special education programs at all. Because so many teachers and resource room classes were cut, some schools had no special education classes. In addition, for the first time, some of the resource room teachers provided programs on an itinerant basis and the remaining resource classes were overloaded. A waiting list had also developed for the resource program.

In a second urban LEA affected by this same state's action, the special education budget was cut by approximately $2 million and about 30 special education teachers were laid off. Parents were upset by this situation, but

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*Children who had been served in these three categories were not included in the child count required for PL 94-142 funds.

the special education director explained to them that the action was a state, not a local decision. The bulk of the children affected by this change were back in the regular education program. Because fewer children were affected in this district than in the former one, the SEA action did not have as strong an impact.

In a third, rural LEA, the impact of the SEA action was minimal, mainly because there were fewer mildly handicapped children in this smaller site. In anticipation of such a change, the district had reevaluated this group of children several years ago and had reclassified those children who were eligible for the SLD program. However, the LEA did lose one homebound teacher as a result of the state's dropping the three handicapped categories.

Finally, in the fourth district that experienced program cuts (in another state) 11 full-time special education positions were eliminated because of state and local factors. When we first visited this LEA in 1978-79, district administrators told us that the LEA was regarded as the "Cadillac" district for special education in the state. However, recent changes in the state funding formula designed to equalize special education funding across the state have had an adverse effect on this district. Although many LEAs have benefited from changes in the state funding formula, this district has suffered financially because of such changes, coupled with local declining enrollment and diminishing state revenue in general. The LEA managed to maintain its level of special education programs and services until 1980-81, when budget cuts forced the special education department to reduce administrative staff and to reduce extended contract days across the board. Having made these cuts last year, the district had little choice but to make instructional personnel cuts in 1981-82. The staff reductions affected programs at the elementary school level more than at the secondary level. However, children had not actually lost SEARS because the special education director shifted away from self-contained classes to resource rooms that could accommodate more children with fewer staff.

In summary, after programmatic growth at the elementary level peaked in the 1979-80 school year, the rate of growth leveled off, and in some cases

actually declined, during the last 2 years of the SRI study. Growth in programs took place primarily for SLD, SED, and EMR children, rather than for the more severely handicapped population.

Secondary School Programs

Special education program gaps at the secondary level were apparent when we first visited the LEAs in 1978-79. Secondary-level programming was lagging behind what was available at the elementary level. By 1979-80, all but three of the study sites were making progress in expanding programs to handicapped students at the secondary level, particularly in the areas of SLD and vocational education programs and services. Despite this growth in programming, SED programs for secondary students represented an area of great need.

In 1980-81, programmatic growth peaked at the secondary level as all but two of the LEAs were allocating more resources to expand secondary programs than to expand other levels of their special education service delivery systems. In addition to changes in SLD and vocational education programs, districts began to make some progress in addressing the unmet needs of secondary SED students. In some cases, the programmatic changes were made in response to outside pressures such as court cases or SEA monitoring. In general, SLD program growth at the secondary level was very limited, but a few LEAs were able to expand these programs to a greater than average extent, because either (1) the sites were located in areas of rapid economic growth (i.e., the Sunbelt), so that resource limitations were not yet an obstacle to expansion, or (2) the district's response to legal pressure was facilitated by a favorable state funding formula. By 1981-82, approximately half the LEAs addressed or planned to address the unmet needs of secondary SED students, as well as the need to expand vocational education options and services for special education students.

Growth at the secondary level slowed in 1981-82 because of fiscal constraints. Only five districts allocated resources to expand or refine secondary programs, primarily in the area of SED programs. Four of these LEAs also expanded programs at the elementary level. One district continued to open more resource rooms and self-contained SED classes on school sites to serve its increasing SED population better. Another LEA also expanded its secondary SED program by adding two teachers to its cooperative program with a private residential treatment center. This program began last year in response to parental pressure to serve this underserved population. This LEA also addressed other gaps in its system by adding a few SLD classes and starting a new pilot vocational assessment program to serve 11th and 12th grade SLD and EMR students. A high school in a suburban site started a new self-contained SED program that serves as an in-school alternative to private residential placement. A fourth LEA continued to expand its SED program by adding a class at the secondary level. Finally, in a district that suffered large special education budget cuts this year, vocational education funds were used to start a pilot vocational assessment program for 9th grade EMR and TMR students.

Of the four districts that experienced special education budget cuts in 1981-82, two districts had program cuts at the secondary level as well as at the elementary level. In one of these districts, there was a cut in the resource room program at the high school level as well as at the elementary school level because the SEA dropped three handicapped categories from state law. An additional cut at the high school level was the closing of three alternative schools. Although few special education students attended these schools, vocational education opportunities were available at the alternative schools for those special education students who attended them. Thus, another gap occurred in the vocational education program. In the second LEA, there was a conscious decision to cut less at the secondary level than at the elementary level when it was determined that 11 full-time special education positions had to be eliminated. This decision was made mainly because the district had placed emphasis on refining secondary-level programming. Primarily because of the number of staff cuts at the elementary level and an increase in the SLD population, waiting lists for

SLD placements were worse at the elementary level than at the secondary level in this LEA. Because state funding for the SLD program had been received as a block grant at the beginning of the school year, the LEA could not request additional funds, in spite of an increase in the number of students in need of SLD programs.

In summary, we have observed some growth in programming at the secondary level over the past 4 years. However, since secondary school students have traditionally been underserved, it was not surprising that LEA and school-level personnel in the majority of the study sites indicated that secondary SED and vocational education programs continue to be the major gaps in their special education service delivery systems.

The Handicapped Population 18 Through 21 Years Old

PL 94-142 requires LEAs to provide programs and services to special education students through their 21st year, unless contrary to state law.* According to SEP's 1982 Report to Congress on PL 94-142 implementation, data reported by the states indicate that youths 18 through 21 years of age are increasingly being provided SEARS by the public schools. In general, however, we have found that the LEAs in our study have not directed a significant amount of attention toward expanding or developing new programs specifically designed for students in this age range. An exception is one site that opened a sheltered workshop in 1979-80 for students aged 18 to 21. This program was designed to fill a gap in services to high-school-age students who did not progress in regular vocational placements. In 1980-81, the LEA expanded the program to include more EMR and TMR students, as well as more autistic students. However, the general pattern we observed was for LEAs to offer secondary students the opportunity to stay in existing special

*Six of the nine states participating in the SRI study have mandatory state legislation to serve handicapped individuals through 21 years of age.

education programs through the age of 21. Although many of the severely impaired students (e.g., trainable and severely mentally retarded) do stay in school to a later age, mildly handicapped students (e.g., SLD, SED, EMR) tend either to drop out of school or to graduate by the time they are 18.

During 1980-81, we investigated programs for the 18- to 21-year-old handicapped population and explored the postsecondary options for special education students after they graduate or leave school. We also tried to assess the transition process to the "real world" to see whether it and the options available in the community had any impact on where special education students go or what they do after they leave high school. We found that school systems do not generally include postgraduation opportunities in their domain of concern, nor does any other agency think in terms of such an age-defined group. Rather, after high school, these students fall into such options as: continuing education (e.g., college, adult education), employment or further vocational training, clients of caretaking or other human services agencies (e.g., vocational rehabilitation and welfare agencies, group homes), and "other" (e.g., military, at home, corrections system, "on the street"). The degree of self-sufficiency and independent living that they attain depends not only on their capabilities and preparation, but also on the social institutions and other local resources available for handicapped people.

In the majority of the study sites, respondents indicated that, after high school, most mildly handicapped students are "assimilated into the mainstream to either sink or swim." The widest range of postsecondary opportunities exists for the higher-functioning SLD students who were in resource programs while in high school. We were told that these students tend to enter the job market directly, join the military services, pursue postsecondary training, or continue their educations at community colleges or private colleges.

We found that postsecondary opportunities for special education students are influenced by local community factors (i.e., continuing

education institutions, employment opportunities, and range of agency services), which vary considerably from place to place. Our specific findings for the 1980-81 school year were as follows:

- High-functioning SLD and mild SED individuals, as well as the motor and sensory handicapped, had the widest range of postsecondary opportunities, including continuing education, employment, vocational training, and military service.
- Employment opportunities for handicapped adults appeared to be a function of a variety of factors, including the nature of the community, the state of the local economy, the quality of vocational training available at the secondary level, and incentives for employment.
- Human services agencies generally provided services to low-functioning EMR, TMR, and severely mentally retarded (SMR) adults. Funding cutbacks, however, may lead to a reduction of such services.
- Because low-functioning SLD and high-functioning EMR students often fail to meet human services agency eligibility requirements, and because few suitable programs exist for them, they may be least well matched with needed social services.

There were no major changes in programs and services to the handicapped population 18 through 21 years old in any of the LEAs from 1980-81 to 1981-82.

Changes in the Range of Handicapping Conditions Served

Over the last 4 years, half of the LEAs in the longitudinal study have increased the range of handicapping conditions they serve. In these districts, programs have been extended primarily to include the more severely handicapped (e.g., TMR, SMR), or those with low-incidence handicapping conditions. For example, four LEAs now serve more TMR and SMR children within their special education programs. Deinstitutionalization, legal pressure, and space availability are the major factors that account for this change.

Deinstitutionalization and legal pressure account for one large urban district's dramatic growth in SEARS to its SMR population. Over time, this district's efforts to improve the quality of the SMR program have included developing and implementing a functional living skills curriculum and integrating SMR students into school settings with peers their own age.

Another large LEA had to develop programs for TMR and SMR children when a state mental health facility within its jurisdiction began to deinstitutionalize these children. Deinstitutionalization also motivated the most significant change in the range of handicapping conditions for a rural district, which now includes TMR, SMR, and multihandicapped students from a state mental institution. With PL 94-142 funds and a state reimbursement formula that favors the provision of programs and services to the severely handicapped, this resource-poor district has gradually expanded SEARS to 50 children from the institution. Although deinstitutionalization forced the issue of whose responsibility it is to provide educational services to these children, the special education director worked in good faith to accomplish this change. As he commented in 1981-82: "The issue showed the county what can be done with severe kids. No one believed that these kids could handle a full day program."

Finally, over the last 2 years, the fourth LEA has used PL 94-142 funds and local resources to acquire the facilities necessary to serve its SMR children within the district, rather than through a contract with a private agency. Special education personnel had questioned the quality of the contracted services, so they thought that the SMR program had improved.

In at least three of the eight LEAs that have broadened the range of handicapping conditions they serve, there are now programs for hearing impaired (HI), visually impaired (VI), or orthopedically handicapped (OH) chidren. One rural district with limited local resources used PL 94-142 funds in 1978-79 to start a program for HI and VI children who were formerly unserved or placed outside the LEA. Another LEA also used its PL 94-142 funds initially to develop a homebound program to provide services to VI

children who had been unserved previously. Finally, primarily in response to parents' pressure to have their children closer to home, a third district started its own OH program for children who had been served through a regional program.

Although the range of handicapping conditions served changed in half the study sites, primarily as a result of external factors, there was no change in the other half of the LEAs. For the most part, the latter districts already served a wide range of handicapping conditions before the passage of PL 94-142.

Despite progress in expanding the range of handicapping conditions served, LEAs and SEAs began to question this trend during the past 2 years, primarily because of fiscal constraints. In 1980-81, we found that the general tone in at least seven of the nine states in the study was that "special education cannot serve everyone." We observed that some states had already limited, or were planning to limit, their support for special education. For example, one state imposed a cap on the number of special education students that can be counted for state reimbursement purposes. This state and several others have also tightened special education eligibility criteria over the past 2 years, primarily for the SLD population.

The range of handicapping conditions to be included within state definitions has also been questioned. This year, one state implemented new special education regulations that deleted three mildly handicapped categories from state law to make it more consistent with PL 94-142 mandates. Another state conducted a special education mandate study in 1981-82 to examine whether the state's special education mandate should be changed. This study grew out of an "increased concern at all levels of government for eliminating unnecessary or unproductive mandates and for increasing decisionmaking at the level nearest the delivery of educational service." In particular, the SEA task force conducting the study investigated "ages served" and "categories." They found that it was in the state's interest to continue to serve handicapped children aged 3 to 21, but

recommended that research be conducted regarding the educational benefits that accrue to students aged 18 to 21. With regard to "categories," the task force recommended that the state regulations specifying categories be eliminated and that provisions "ensuring appropriate instructional placement" be included in the mandated continuum from diagnosis to placement. Although these recommendations have been made, there will not be any changes in state regulations until 1982-83.

In addition to some questioning at the SEA level of who should be served in special education, people at the LEA level were anticipating that changes would be made at the federal level by the proposed regulations that were being developed by SEP. In 1981-82, we investigated whether LEA special education administrators would change the range of children they served in special education if there were no federal priorities to serve the unserved, underserved, 3- to 5-year-old, and 18- to 21-year-old populations. We asked the administrators to make two alternative assumptions: (1) that there would be no change in financial resources and (2) that there would be diminished financial resources.

In the first case, most special education administrators responded that they would change very little. Several commented that, unless their state special education laws changed, they would still be mandated to provide these same programs. In addition, most felt they had moved in the appropriate direction in expanding special education programs since the passage of PL 94-142.

Several different themes emerged, however, when special education administrators were asked to anticipate where reductions might have to be made if financial resources were reduced. Because educators perceive that early identification and remediation reduce problems that the schools must eventually confront, there appears to be more local commitment to maintaining early childhood programs for handicapped students than to providing special education programs and services to the 18- to 21-year-old handicapped population. Because LEAs perceive their responsibility as being directed primarily to school-aged children, administrators in at least four of the

study sites mentioned the 18 to 21 population as a possible target for future cuts. Additionally, administrators in two of these four sites, as well as in two other LEAs, specifically mentioned preschool programs as an area in which they would not like to reduce services.

Administrators in at least half the study sites anticipated that the mildly handicapped (e.g., SLD students) would be likely to lose special education programs and services if resources continued to diminish. This attitude was consistent with last year's observation that local administrators anticipated that the mildly handicapped population would suffer if support to special education weakened. These mildly handicapped students would most likely be served in the regular education program and could benefit from regular education remedial programs if they existed in their district.

In three study sites, administrators indicated that reduced programs and services would most likely be felt by both the mild and severely handicapped if resources continued to decline. In one of these LEAs, specific court cases have addressed the needs of both SLD and SMR students. Therefore, neither category would be expected to bear the total burden of service reductions. In another LEA, which has already been faced with the task of reducing special education personnel, the practice has been to distribute the cuts evenly across the various programs. In the third LEA, the special education director commented: "I'd put money in EMR, TMR, blind, deaf, and physically handicapped." He further commented that he would put less emphasis on the very mildly handicapped, who could function as part of the main body of the school, and on the very severe cases, who require custodial care.

Administrators in at least four study sites discussed various issues related to the provision of SEARS to the severely and profoundly handicapped in the context of declining resources and relaxed federal priorities. Three of these LEAs were considering alternative staffing patterns to provide programs and services to the SMR population more cost-effectively. For instance, two of the LEAs were considering the possible use of more trained

paraprofessionals and fewer certified staff. One LEA had specific plans in place for the 1982-83 school year, when the special education director intends to decrease the number of certified personnel serving SMR students and increase the number of paraprofessionals. In this district, during the 1981-82 school year there was one certified staff member for every four SMR students. During 1982-83, there will be a 1:40 ratio of certified personnel to SMR students; however, a 1:4 ratio of either certified or paraprofessional staff to SMR students will be maintained. An additional LEA was questioning the appropriateness of the public schools' being responsible for the "education" of SMR students who require mainly custodial care and most likely will never be tax-producing citizens. It was suggested that perhaps these severely handicapped students should be served by health or welfare agencies rather than by the schools. This same issue surfaced in another state, where, at the time of our site visit, there was a movement to redefine who is "educable" so that the education system would be able to put limits on its service delivery responsibilities. In part, this is a financial issue (i.e., why so much money should be invested in the SMR population, whose chances to be tax-producing citizens are not as great as those of the more mildly handicapped).

Increase in the Learning Disabled Population

In a recent study, the General Accounting Office (U.S. Comptroller General, 1981) reported that the proportion of children classified as learning disabled has risen dramatically over the past few years. They also reported that, in school year 1980-81, the number of learning disabled children served increased in 48 states. On the basis of child count data, SEP's 1982 Congressional Report also noted that the most dramatic growth nationwide has taken place in the SLD category. SEP reported that the SLD category now accounts for about 3% of all school-age children and 35% of those who are receiving SEARS (Special Education Programs, 1982).

In the SRI study, we have consistently observed increased growth in the SLD population across the LEAs over the last 4 years. In some districts

with relatively small SLD populations, the increase has been slight, with a few additional classes being added. However, there has been considerable growth in about half the study sites, especially the districts with large special education populations.

For example, in one urban LEA, the SLD population increased from 2.3% of the school population in 1977 to 6% in 1981-82. This site is in a state with an extremely broad definition of SLD, so the LEA has considerable discretion on its eligibility criteria. In addition, because of an active Association for Children with Learning Disabilities (ACLD) chapter, the schools have been under pressure to increase SLD programs. In response to PL 94-142 and a court case, another urban district has experienced a dramatic growth in its SLD population. Before passage of the law, this LEA had served SLD students over 10 years of age in private schools. PL 94-142 funds have consistently been targeted to increase the number of programs for SLD students, particularly at the secondary level. By 1981-82, almost every school in the city had at least one SLD class.

In 1978-79, we reported that the number of children found eligible for SLD programs was increasing, relative to the number of EMR children. One factor related to this shift is a trend across the nation in redefining eligibility criteria for EMR and SLD programs, such as the interpretation of scores on intelligence tests. As a result, children who might have been eligible for EMR programs in the past now qualify for SLD programs. We have suggested that another factor related to this shift is that there is less stigma attached to the SLD classification than to mental retardation. Over the past 4 years, we have continued to hear LEA and school personnel comment on the greater social acceptability of the SLD classification. As LEA administrators in two very different districts--one urban and one suburban--commented:

> SLD was the popular thing to be; it was better than being retarded.
>
> The two status symbols here are braces and SLD services--parents see SLD services as private tutoring.

We have noted previously that SLD eligibility criteria are generally defined by state law and SEA regulations and that such criteria vary considerably from one state to another, both in the ambiguity of the definitions (which permit a certain amount of interpretive discretion) and in the comprehensiveness of the criteria. This variability means that a child could be identified as in need of special education in one state and not in another. In addition to state-to-state variation, there is also considerable within-state variation (across LEAs and even among schools within LEAs), especially in states with eligibility criteria allowing considerable discretion. Over the last 4 years, we have observed efforts to tighten SLD eligibility criteria in several states and districts. However, because of the current "state of the art" in diagnosis of perceptual processing and learning problems, LEA personnel must still struggle with the issue of who belongs in SLD. Across LEAs, the personal discretion of the evaluators (i.e., their clinical judgments, interpretation of eligibility guidelines, professional philosophy) is still the major determinant of which children qualify for SLD.

Programs and Services to Nonpublic Schools

In general, there have been few changes over the last 4 years in the provision of programs and services to nonpublic schools within the jurisdiction of the study sites. Almost all the LEAs have provided diagnostic services to the nonpublic schools, if requested. By 1980-81, we found that LEA procedures for dealing with programs and services to children from nonpublic schools had become more routine in some sites. For example, one district organized a "special admissions team," funded by PL 94-142 monies, to provide referral, testing, placement, and inservice functions for nonpublic schools that refer their students for LEA special education programs and services.

In the districts that have provided direct programs and services to nonpublic schools, those most commonly delivered are speech therapy and SLD programs. Only one resource-rich suburban district placed great emphasis on

providing SEARS to the non-public-school population during the course of the SRI study. At the elementary level in this district, the biggest change was the provision of diagnostic and direct services to non-public-school children. As a district special education supervisor commented: "This was the biggest effect of PL 94-142. We started with just speech therapy 4 years ago. Now, the LEA has daily buses to transport non-public students for SLD and speech therapy."

Private School Placements

A pattern that we have observed over the past 4 years is that LEAs have been able to reduce the number of students that they place in private day or residential schools, primarily by expanding their own SEARS delivery systems to accommodate these handicapped students. The most dramatic decrease in the number of private school placements over time occurred in a large urban district that made a concerted effort to develop programs for its own SLD, SED, and SMR students and to monitor closely who is placed in private schools. Part of an LEA administrator's job has been to make certain that private school placements are made only when the public schools cannot provide appropriate programs and services. Since 1977-78, the district has reduced the number of students in private school placements from 2,900 to 1,300. Where private school placements tend to persist, they tend to be for adolescent SED students for whom the district has not been able to develop enough alternative SED programs and services within the LEA.

The issue of fiscal liability for the full costs of educating handicapped children placed in private schools was a major concern in Illinois and Pennsylvania. In 1979-80, two court cases, Gary B. v. Cronin in Illinois and Gittelman v. Scanlon in Pennsylvania, concerned the full costs of educating handicapped children in private schools. This year, court action regarding this issue continued in Illinois in two other cases: Claudia K. v. Wauconda School District 118 and Special Education District of Lake County (SEDOL) and William S. v. Board of Education, Barrington School District 220, et al. In each case, the issue is LEA fiscal liability for

paying the entire cost of maintaining the student in residential facilities. These costs include not only education but also counseling, therapy, transportation, and room and board. The LEAs contend that they are willing to pay only the educational costs for these children. In Claudia K.'s case, this meant that the district does not want to pay for the intense psychotherapy and counseling needed to restore her mental health, nor for the room and board costs for a residential setting that could provide such care. In William S.'s case, the district contends that it could take care of the student's education needs, including physical therapy (PT), occupational therapy (OT), and behavior modification, if he could be kept at home.

In Claudia K., a Lake County Circuit Court judge ordered Lauconda and SEDOL to place Claudia K. in an appropriate residential facility by September 1981. The districts appealed to the Illinois Supreme Court, which overturned the lower court decision on June 1, 1982. However, because the court ruled on procedural grounds and did not address the merits of the case, Claudia K.'s attorney may petition the high court for a rehearing.

In William S., the Barrington District and SEDOL sued the SEA as well as the seven state agencies they contend should abide by a 1980-81 memorandum of understanding among the agencies. At the time of our last visit, the lawsuit was pending before Judge Milton Shadun in the U.S. District Court. However, on March 31, Judge Shadun handed down a memorandum opinion, an order that supported the districts' complaints by asking the state agencies to answer these complaints.

The final outcomes of both of these cases may help build a case law defining LEA fiscal liability for all services handicapped children require in private placements.

Provision of Related Services

In the existing PL 94-142 regulations, a free appropriate public education is defined to include both special education and related services, where related services are:

> transportation and such developmental, corrective, and other supportive services as are required to assist a handicapped child to benefit from special education, and includes speech pathology and audiology, psychological services, physical and occupational therapy, recreation, early identification and assessment of disabilities in children, counseling services, and medical services for diagnostic or evaluation purposes. The term also includes school health services, social work services in schools, and parent counseling and training. (Section 300.13)

The initial implementation of these guidelines raised many questions and caused many problems, as LEAs struggled with issues such as which related services to provide, as well as how to coordinate with other agencies in the provision of these services. These problems confronting LEAs have gradually lessened over the last 4 years, as the issues have been clarified by factors such as due process hearings, court cases, monitoring, and SEA and LEA policy papers. Below, we present an overview of the specific changes that we observed at the LEA level in the following areas:

- The types and amounts of related services provided
- The borders of LEAs' responsibility
- Interagency agreements.

Changes in Related Services

In general, the LEAs studied by SRI varied widely in the types and amounts of related services provided. The range of related services provided by an individual LEA seemed primarily related to the availability of resources, as well as to parental expectations. For example, we have seen examples of relatively resource-poor LEAs, with low parental

expectations, in which some "basic" related services, such as counseling services, are not provided. In contrast, some resource-rich LEAs with high parental expectations offered such related services as psychiatric counseling, hydrotherapy, and mobility training. The range of related services offered varied more among sites than did the range of special education programs offered and was more related to resources and expectations. This situation may have come about because there was more room for interpretation of the related services provision of PL 94-142 and its regulations, as well as because LEAs tended to give special education programs higher priority than related services.

When PL 94-142 was first implemented, LEAs generally increased their provision of related services. This increase resulted from a combination of factors, including the availability of PL 94-142 funds, court cases, and the availability of state funds, such as from California's Master Plan for Special Education. Thus, in the first few years of SRI's study, we saw a gradual increase in the provision of related services by LEAs. For the most part, changes could be characterized as "more of the same." However, we also saw examples of the addition of new related services. As expected, the expansion generally was greatest in resource-rich districts with high parental expectations.

For example, in 1979-80, we reported an expansion in some sites of related services that had existed previously, but with inadequate coverage. Such services typically included:

- Occupational and physical therapy
- Adaptive physical education
- Speech therapy
- Psychiatric consultation.

During 1979-80, we also saw two sites providing new related services (that is, services never previously offered by the districts), including music therapy and play therapy. The following year, the addition of "more of the same" continued in many sites, but we also saw the addition of several new

services. For example, one district added parent training, and two districts provided catheterization as a related service for the first time.

In general, this increase in related services mainly benefited the more mildly handicapped children, often because the more severely handicapped were already receiving many related services before passage of PL 94-142. A major exception to this trend occurred in LEAs that, after the implementation of PL 94-142, brought back more severely handicapped children from placements outside the LEA; these LEAs also had to increase related services for the severely handicapped.

As described in our earlier reports, many sites targeted PL 94-142 money to expand their provision of related services. Many sites placed more emphasis on special education programs than on related services; because the federal money was often viewed as "soft" and unstable, districts preferred to spend that money on "extra areas" that they were more willing to lose (although the areas might be required under PL 94-142). In fact, very few districts spent their PL 94-142 money on teacher salaries for basic programs; in general, those that did were poor in resources and had no other source of money with which to expand the basic programs.

The following examples demonstrate different districts' uses of PL 94-142 money for related services:

- In one expanding, resource-rich site, PL 94-142 money was used to supplement areas not adequately funded by the state funding formula, primarily in the area of related services. This approach was taken for two reasons. First, if federal funds were reduced, the LEA felt that it would lose only the extras, not the basic programs. Second, this approach was expected to keep the state from reducing its financial support to special education; that is, if the LEA were to spend its PL 94-142 money on basic programs, the state might underestimate the amount of state money needed to maintain special education in that LEA.

- Administrators in another resource-rich LEA commented that they made a conscious decision when PL 94-142 was implemented "to spend PL 94-142 dollars on things we could live without or on things transferable to local dollars...because we knew the federal dollars were shaky." Thus, PL 94-142 money has been spent in this district on related services, among other things.

- In an urban site, PL 94-142 money has been used as a "cushion" to supplement its existing special education program.

- A poor rural district has mainly used PL 94-142 money for special education teachers, because it had no other money to use for expansion. However, the state in which this district is located sets aside 25% of its PL 94-142 money as discretionary funds, for which districts can apply. This rural district has tried mainly to expand related services through the use of this discretionary money (although it has received very little).

As resources tightened in 1981-82, the expansion in related services appeared to be slowing. Because LEAs have tended to emphasize special education programs more than related services, we would expect to see a contraction in related services before a contraction in special education programs. In addition, those places with a contraction in programs should also show a contraction in related services. This pattern generally was supported by the data obtained.

Many LEAs exhibited no change in either related services or special education programs in 1981-82. Several LEAs, however, cut related services, rather than cutting programs. These cuts in related services involved increasing case loads, decreasing service delivery time, and not providing services to some children. The cuts primarily affected the more mildly handicapped, rather than the more severely handicapped children. For example, one LEA in California had dramatically increased both programs and related services after receiving increased funding from PL 94-142 and Master Plan several years ago. However, with the cutbacks necessitated by Proposition 13, it has decreased related services rather than programs. These cuts in related services deepened in 1981-82, and have involved cutting services such as speech therapy. As another example, a rural LEA (in another state) cut related services this year for the first time; these cuts involved adaptive physical education and speech therapy. Personnel in this district decided to cut related services rather than programs (e.g., they are now looking at related services to determine what's "really necessary"), although program cutbacks are expected in 1982-83.

Resource limitations in some LEAs have forced cuts in both related services and programs. In fact, 1981-82 is the first year that we have seen an actual shrinkage in special education programs (although program expansion began to slow the previous year). For example, one LEA in extreme financial trouble lost many special education programs; in addition, it experienced cuts in related services such as speech therapy, school counselors (there was a systemwide cut in the number of elementary guidance counselors), and counseling through the Mental Health Center.

In fact, we saw continued expansion of related services only in those LEAs that were still expanding programs. These were generally resource-rich sites, which have not had to make any cuts yet. In terms of related services, these sites mainly added "more of the same," although several new related services were added. For example, an urban LEA located in the Sunbelt continued its program expansion this year; in addition, it increased counseling services and added orientation and mobility training, a new related service, for several blind students. Another Sunbelt LEA also simultaneously increased programs and related services; for example, the LEA increased OT services and hired two nurses to work with profoundly retarded children. A third LEA also added both programs and related services; for example, increases were seen in OT, PT, social work, speech therapy, and transportation for parochial school children who came to the public schools for speech therapy.

When questioned about specific strategies that might be used at the local level in the event that federal, state, and local resources continue to diminish and if federal priorities to serve the unserved and underserved are relaxed, at least half of our study sites reported that there would probably be reductions in the provision of related services rather than programs. LEA administrators spoke in terms of "tightening up" on the provision of related services. For example, one director of special education said he would provide special transportation only in situations where it was required to ensure a student's access to a particular program rather than for convenience. Others spoke of the possibility of future cuts

in speech therapy, adaptive physical education, and physical and occupational therapy. Interestingly, many of these related services were increased as a result of PL 94-142 funding. If resources continue to diminish, related services appear to be a prime target for further cuts.

Borders of Responsibility

When PL 94-142 was first implemented, LEAs encountered the issue of the borders of their responsibility to meet the seemingly open-ended mandate to provide SEARS to all eligible children. In part, this issue arises because of resource limitations. In addition, part of the issue is a problem of the state of the art. For example, there are no generally accepted guidelines, nor is there professional agreement, regarding the needs for which given related services are "necessary for a child to benefit from the education program." Also unaddressed are questions about how to determine the amount of a particular related service necessary to meet a child's educational needs.

These border issues mainly have revolved around the question of educational versus medical related services; most frequently, these have concerned the responsibility for provision of and payment for mental health services (psychological or psychiatric counseling) and occupational and physical therapy (OT and PT), although the latter has generally been less problematic because LEAs can often provide these services through their own personnel or through existing agreements with local agencies or hospitals. These border issues seem mainly to have arisen in relatively resource-rich districts with high parental expectations. For example, these issues were a major question in local due process hearings in the first few years of the law's implementation.

As time went on, the issues of the borders of LEA responsibility have gradually lessened, as due process hearings, court cases, state and local policy papers, and SEP monitoring slowly set de facto standards for the boundaries of the schools' responsibility. For example, we have seen many

different effects of due process hearings on border issues. Because of a due process hearing in one LEA when PL 94-142 was first implemented, physical therapy is now routinely provided as a related service, and more speech therapy is also routinely provided (two or three times a week, rather than once or twice). The result of a hearing in another LEA led to its not providing psychiatric counseling as a related service because the state appeals officer decided that psychiatric counseling was a medical service and not the responsibility of the LEA.

In addition, due process hearings in other parts of the country have affected the borders in the LEAs we studied. For example, in 1980-81 two sites in different states provided catheterization as a new related service. In both districts, this service was added because the special education administrators anticipated the demand for it, given legal decisions in other states that ruled in favor of parents who requested catheterization. As one LEA special education director stated: "Rather than wait until we were told to do it, we did it."

At the time of our 1981-82 site visits, LEAs were engaged in less of a debate over border issues. For example, the number of due process hearings concerning border issues has decreased dramatically over the last 4 years, as some consensus developed in each site.

However, different LEAs still "hold the line" at different points. This "line" is mainly determined by resources on the one hand and parental expectations on the other, and a child can receive different related services depending upon where she or he lives. For example, in one site with high parental expectations and extensive resources, a learning disabled child with emotional problems can get counseling in the schools and even receive individual psychotherapy from a psychiatric social worker employed by the public schools; in another site with much fewer resources and low parental demands, no counseling (much less psychotherapy) is provided by the LEA, although it may be informally recommended that the parent take the child to a Mental Health Clinic (where the parent pays on a sliding scale).

This "recommendation" is not written on the IEP, since doing so would make the LEA responsible to pay for the service. Thus, the latter district, in effect, has defined counseling as not necessary for the child to benefit from his or her education.

We have consistently found that the majority of the LEAs in the SRI study regard psychotherapy and psychiatric counseling services as medical, not educational, services. Some have not classified psychotherapy and psychiatric counseling as either educational or medical services because the issue has not arisen (i.e., there is little demand for these services). Finally, one district in the SRI study may or may not recommend psychotherapy, depending on the recommendation from a diagnostic evaluation committee set up several years ago.

Interagency Agreements

An issue related to the borders of LEA responsibility has persisted over the last several years: how to obtain the interagency coordination necessary for the schools to provide related services. The problem is created by (1) the "general supervision" clause of PL 94-142, (2) the law's requirement to provide related services to handicapped children at no cost to their parents, and (3) the political and financial realities of how state human service delivery systems function on a day-to-day basis.* Under the general supervision clause (Section 300a.600 of the final regulations), PL 94-142 requires that SEAs alone be responsible for ensuring that related services are provided to special education students, and it is presumed that other human services agencies will acknowledge shared responsibility for the provision of these services. But, as we have consistently seen over the last few years, other agencies in the study sites are responsible for only limited and fragmented services, and none has a universal obligation to

* A more thorough discussion of this problem is contained in Greene (1980).

provide services to all the handicapped students who need them. In 1981-82, the problem still remained: under PL 94-142, the agencies held accountable if services were not provided were the LEA and, ultimately, the SEA.

Although states have been making progress in implementing interagency agreements, there continues to be wide variation in the extent to which human services to the handicapped have been effectively integrated. In part, this integration depends on court cases and SEA leadership and state laws. At the local level, the amount of resources is important; when adequate local resources exist, there is generally not a great need to seek formal interagency coordination.

Thus, at the local level, implementation of PL 94-142 and its accompanying regulations has required district administrators to reassess and renegotiate their relationships with other agencies that provide education-related services. Coordination agreements between districts and other service delivery agencies seem to work well only when the LEA contracts directly with a vendor for services, or when there is a direct personal relationship between the district personnel and the service agency. When these conditions do not exist, special education administrators realize that they have too little "clout" to coerce other agencies into meeting LEA priorities and too few resources to provide and pay for services denied by other agencies. This situation has resulted in the following finding, which has been consistent over the years of our study: IEPs for students in LEA-based programs regularly include needed related services to the extent that: (1) the LEA provides the services directly, (2) they are provided by contract with another agency, or (3) they are provided on the basis of a personal agreement between an LEA administrator and his or her counterpart in another agency. In practice, therefore, the services recommended in an IEP are the related services accessible to the LEA, not necessarily those appropriate for the student. Although LEA personnel in the study sites were concerned about meeting the needs of their special education population, special education administrators in all the LEAs have remained concerned about district liability for IEP recommendations of related services.

Problems in Implementing the SEARS Mandate

Fiscal constraints have been the primary obstacle to implementing PL 94-142's SEARS mandate. As we described earlier, in the 1978-79 and 1979-80 school years, there was considerable expansion of special education programs and services, which resulted in an increase of special education personnel. However, as local school budgets became tighter, special education's growth slowed, and in some cases contracted, by 1981-82. As program expansion became much more limited, districts were unable to hire additional special education personnel and, in some cases, had to cut their staffs. Given these constraints, many teachers and related service personnel (i.e., the existing work force) have had to take on additional responsibilities and workloads to try to maintain appropriate programming for handicapped students.

Besides fiscal constraints, there have been other obstacles to implementing the SEARS mandate. In the rural LEAs, problems remain in recruiting and retaining special education personnel. In a few sites, LEA and school personnel perceived the lack of parental pressure to be a problem in achieving the full service goal of PL 94-142.

A lack of systematic planning or strong leadership at the LEA administrative level hindered some LEAs in moving ahead toward the full service goal. Districts with high quality special education service delivery systems in place by 1978-79 had fewer problems because they had already planned to fill gaps in their continuum of SEARS. However, the federal mandate pushed them to move ahead faster. As the special education director of one such district commented: "We had identified the problems and were acting on them. Without the law, we would have gone the same way, but more slowly."

For the most part, state special education laws similar to PL 94-142 in requiring the provision of SEARS to handicapped children aged 3 to 21 have facilitated the implementation of the federal mandate. In California, for

example, the Master Plan for Special Education made SEARS mandatory to the 3- to 21-year-old population at approximately the same time that LEAs began to implement the federal law.

Certainly, the concept of providing a free, appropriate public education for all handicapped students is well accepted at the LEA level. However, the achievement of that goal remains elusive, primarily because of fiscal constraints.

Effects of the SEARS Mandate

With few exceptions, the SEARS mandate has had positive effects, especially on LEA administrators and children. Most LEA special education directors commented that the primary effect of the federal mandate was that it helped them to address gaps within their SEARS delivery systems. Clearly, the provision of SEARS was a high priority in most of the LEAs. The impact on LEA administrators is reflected in the following comments from two very different LEAs--one rural and one urban:

> PL 94-142 gave us the clout to institute services we had wanted to do in the past.
>
> PL 94-142 has revolutionized education in this city. We couldn't have been as successful without the law.

The only negative effects of the federal mandate on LEA administrators appeared to be indirect. That is, where fiscal constraints (caused primarily by local and state resource problems) were a big problem, LEA special education directors did not perceive much of a positive effect of the federal mandate.

In general, the SEARS mandate, along with the flow-through funds associated with the law, enabled most LEA administrators to serve previously unserved and underserved handicapped children. Thus, the primary effect on children has been the increase of special education and related services.

In some cases, new types of students were served (e.g., the 0- to 3-year-old population, the SMR population) and existing programs were expanded to serve underserved populations (such as SED, SLD, and EMR) better. Related services were also expanded. As the special education director in an urban site summed it up:

> PL 94-142 was worth it with regard to FAPE, although we've been pushed beyond it at times. The effect on kids has been 98% positive. We're providing services to those we wouldn't otherwise.

Remaining Challenges in the Provision of SEARS

In general, district priorities for serving the unserved and underserved have remained consistent over the last 4 years. Progress has been made in expanding special education and related services to handicapped children at the preschool, elementary, and secondary levels, particularly for SLD, SED, and SMR students. The school districts in the SRI study have better addressed the needs of handicapped children at the secondary level, especially in the areas of SLD, SED, and vocational education programming. In general, however, SED and vocational education programs at the secondary level remain the major remaining challenges for the LEAs. Gaps remain in the provision of related services as well, primarily the services of social workers, psychologists, and counselors.

We reported last year that LEAs would be challenged to maintain the status quo or to expand SEARS, given steadily diminishing resources to meet the unique needs of handicapped children. In 1981-82, most districts were able to maintain the status quo, but special education budget cutbacks created programmatic cuts in a few LEAs. Although some of these cuts depended on local factors (e.g., declining enrollment, lack of local support for special education), state factors were important as well.

Changes Related to the Least Restrictive Environment Provision

Changes in the Continuum of Placement Options

To meet the law's intent that the individual child's needs be matched with appropriate special education and related services in the least restrictive environment, school systems must provide not only a full range of programs and services and a variety of placement options, but also sufficient openings to permit a choice of programs and services. During the first year of the study, to determine the progress being made in implementing the LRE provision of PL 94-142, we examined the range of the continuum of placement options that existed within the study sites. We found that this continuum varied considerably by LEA. At one extreme were the LEAs that provided only self-contained classes for mildly and moderately mentally retarded children, resource rooms for learning disabled children, and itinerant speech therapists for children with communication problems. At the other extreme were the LEAs that directly provided a variety of services and placement options to children who were severely and profoundly retarded, blind, deaf, orthopedically handicapped, and emotionally disturbed, as well as mildly learning disabled. The latter extreme, however, was an exception to what typically existed at the LEA level. We concluded that the decision for special education placement rarely represented a choice among a range of placement options and, therefore, rarely reflected a consideration of the least restrictive environment appropriate to the child.

As implementation of PL 94-142 progressed, we continued to examine changes in the continuum of alternative placement options available in each of the LEAs. During 1979-80, we found that the widest continuum of placement options was available to mildly handicapped students (e.g., EMR, SLD). The continuum at the elementary level usually consisted of self-contained classes, resource rooms, and regular class placement with support services such as speech therapy, OT, PT, or counseling. More severely handicapped students (e.g., severe SED, TMR) rarely had a variety of placement options available to them. Most frequently, these students

were being served in self-contained classes. At the secondary level, we found evidence of a continuum of placement options in relatively few sites. When such a continuum did exist, it served mainly the mildly handicapped.

We also found in 1979-80 that some LEAs were consciously expanding their range of placement options. For example, one site had created a new placement option to accommodate high-functioning TMR children. Another had developed several new options for severe SED students, including off-campus programs as well as part-time placements. We concluded that, although the number and type of placement options were still influential factors in determining the placement of special education students, some progress was being made in extending the range of programs available in a growing number of LEAs.

By 1980-81, consistent with limited growth in SEARs, there was a limited expansion in the continuum of placement options for special education students in the majority of the study sites. As was true during the previous year, there was still a wider continuum of placement options available to the mildly handicapped. Much of the expansion that did take place, however, was directed toward the more severely handicapped. Two resource-rich districts continued to expand their continuum of program options for SED students. Another district opened a new option for high-functioning high-school-aged TMR students. This option for TMR students, located at a high school, was instituted in response to advocate pressure to do more mainstreaming of the severely handicapped. The only option that had previously been available for these students was special schools within the LEA.

During the final year of the study, we again noted only minor expansion taking place in the continuum of placement options in the majority of the study sites. One major exception took place in a resource-rich LEA that has been committed to developing a range of options for severe SED students. Locally, provision of appropriate programs for the SED population has been perceived as a major gap. A new SED program was initiated at the high school level, which serves as an alternative to private residential

placements. Another high school in the same district was planning a new SED self-contained program for 1982-83. This program would be an alternative for students who could not be served appropriately with students in the existing SED self-contained program.

Thus, over 4 years, the general trend showed some expansion in the continuum of placement options within the LEAs and showed that more placement options tended to be available to the mildly handicapped. However, as implementation of the law progressed, some LEAs began to expand options for the more severely handicapped as well. By the last 2 years of the study, the expansion of new placement options had lessened considerably as program expansion slowed. This slowing was primarily the result of fiscal constraints confronting many LEAs. Although the continuum of placement options still varied considerably among LEAs, there were fewer sites at the one extreme of the continuum that provided only self-contained classes, resource rooms, and itinerant speech therapists. LEAs have made some progress in directly providing a variety of services and placement options to a wider range of handicapping conditions.

LRE Decisionmaking

Despite the expansion that has taken place in the continuum of placement options available to handicapped students, LEAs still are faced with constraints when making LRE decisions for individual students. These have lessened over time in some of the study sites; however, the availability of resources (i.e., placement openings) is still influential in determining how students will be served and what constitutes the least restrictive environment.

As was mentioned previously, during early implementation of PL 94-142, we found that in most LEAs the decision for placement rarely represented a choice among a range of placement options. In some sites, programs and placement were tightly linked; essentially, the decision to provide a

particular program was also the decision to serve the child in a particular setting or facility. For example, in several sites programs for EMR students could be obtained only in self-contained classrooms, and programs for TMR students could be obtained only in a separate facility. In other districts, this link existed only for certain handicapping conditions. With a few marked exceptions (e.g., resource-rich LEAs), the resources to provide such a range of options and, therefore, the ability to decouple programs and setting were rare in the sites that SRI studied. Even when there was a choice of settings for providing a particular program, the choice was likely to be made on the basis of immediate availability (a "slot" for the child). For example, a psychologist in a large urban LEA commented: "I come up with what the kid needs and that gets balanced against what's available." Thus, we concluded that despite what the law envisioned, consideration of the least restrictive environment criterion was likely to be an afterthought in the placement decision.

As implementation of PL 94-142 progressed and many of the study sites had at least somewhat expanded their range of placement options, more LEAs were consciously considering the least restrictive environment provision of the law when making placement decisions than when the study began. For example, in one site there is a section on the current IEP form that specifies the placement options that were considered by the multidisciplinary assessment team before making the placement recommendations. Another LEA in a state where special education programs are now being provided on a program, rather than categorical, basis under state law reported greater flexibility in placement decisions, which resulted in individual needs being better taken into account. Finally, a rural site, which in 1978-79 had only a limited range of placement options and frequently lacked an adequate number of available placements, expanded program options over the 4 years, especially to SLD and SED students. A psychologist commented that she thought multidisciplinary team members were now more concerned with placing students appropriately: "More people are fighting for kids....In the past I thought that I was the only one."

By 1981-82, there were still a number of sites that, despite efforts to expand their continuum of options, faced constraints when making LRE placement decisions. For example, several sites continued to deliver special education programs to students in ways that tightly linked the program and setting to the handicapping condition. Several other sites, particularly those that have faced budget cuts, may have a wide range of placement options available across the LEA's jurisdiction but have limited openings within these potential placement options. Placement teams know that there are few openings and thus cannot truly consider a range of options when making individual student placement recommendations. Finally, in sites that are making efforts to curb transportation costs and serve students in their home schools, or in rural sites where transporting students across the county to particular programs can involve very long bus rides, the only options available to students are those existing in the home school. Particularly in small rural sites, this may be simply a resource room or a self-contained class.

Changes in Settings

SEP's 1982 Congressional Report noted that handicapped children have been increasingly receiving their education in regular classrooms or at least in regular education buildings since the passage of PL 94-142 (Special Education Programs, 1982). In the SRI study, we have observed some general changes in the settings in which handicapped students are receiving special education and related services. In most instances, these changes appear to be consistent with the least restrictive environment provision of PL 94-142. Since the passage of the law, we have noted the following trends:

- More students are being served in resource rooms than in self-contained classes.
- There has been a movement toward the development of noncategorical placement options.
- Students who traditionally have been served in separate facilities or centers are being moved into regular elementary or secondary schools.

- Deinstitutionalization from state facilities has brought an increased number of severely handicapped students into public school settings in some districts.

- Some LEAs have made efforts to develop public school programs to serve handicapped students formerly served in private schools.

In a number of the study sites, we have observed a shift away from serving handicapped students in self-contained classes to favoring the resource room model. In several instances, this change occurred because of pressure from the SEA. In some cases, new state special education funding formulas provided LEAs with incentives to serve students in this manner.* In other instances, SEA monitors encouraged the development of resource rooms because they regarded them as being more consistent with the LRE goal of PL 94-142. Still other sites began to move in this direction for a combination of reasons, including their own budgetary considerations. At least in several states, it appears to be more cost-effective to serve mildly handicapped students in resource rooms. It should be noted that some LEAs, primarily rural sites, resisted this shift to resource rooms because they believed that the self-contained setting was more "appropriate," especially for younger handicapped students.** Nevertheless, it is apparent that a greater proportion of mildly handicapped students are now being served in resource rooms. This also means that they are now more likely to be spending at least a portion of the school day in a regular classroom setting.

In at least three states, we have also seen the development of a noncategorical placement option. Again, this option usually accommodates the mildly handicapped (e.g., SLD, EMR, SED). Serving these different types of students in the same classroom frequently has reduced the need for

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*For more detail on the incentives and disincentives of different state special education funding formulas, see Moore, Walker, and Holland (1982).

**Resistance to change in rural areas was noted as a major problem in implementing PL 94-142 in the National Rural Research and Personnel Preparation Project. For more detail, see Helge (1980).

additional transportation and has encouraged the practice of serving students in their neighborhood schools. However, some parents and educators have expressed concern about the appropriateness of serving various handicapping conditions in the same classroom. As one special education teacher commented: "We're spending a lot of money on programs that can't benefit some kids." In another LEA that recently shifted to serving more students in noncategorical special education classes, an LEA consultant acknowledged that it has been positive for special education students to remain with their peer groups in their home schools. However, she pointed out, the negative impact on children has been that some students really need a homogeneous self-contained setting and now "this possibility is nil."

In several LEAs, handicapped students (e.g., TMR, SMR, OH) who traditionally have been served in separate facilities or centers were being moved into regular elementary or secondary schools. This was often done to provide the more severely handicapped students with a more normal educational experience with their age-appropriate peers. In at least two cases, it was also done in an attempt to provide high-school-age handicapped students with better vocational education opportunities.

At least four of the districts have experienced an increase in the number of severely handicapped students served locally because of deinstitutionalization activities taking place in their respective communities. This movement was discussed in more detail earlier in this section under "Changes in the Range of Handicapping Conditions Served." It is representative, however, of further attempts to serve handicapped students in the least restrictive environment.

Finally, several LEAs that traditionally had a number of students in private school placements made efforts to develop public school programs further so as to provide local service to handicapped students formerly served in private schools. This issue was also discussed earlier in this section under "Private School Placements." This trend is another example of how the least restrictive environment provision of PL 94-142 has affected the manner in which handicapped students are receiving programs and services.

Problems in Implementing the Least Restrictive Environment Provision

The problems associated with implementing mainstreaming activities were discussed in Section II. In implementing other aspects of the LRE provision, LEAs confronted fiscal constraints and attitudinal problems, as follows.

Fiscal constraints have reduced several LEAs' capacity to extend their continuum of placement options to a range wide enough and with sufficient openings to allow for the least restrictive environment to be truly considered when making individual student placement decisions. This problem has confronted large and small districts, as well as urban, suburban, and rural LEAs. If adequate resources are not available at the local level, LRE becomes an afterthought in the placement decision, despite good intentions.

Attitudes have also posed some problems in implementing the LRE provision in a number of LEAs. Most sites reported that regular administrators' and educators' attitudes toward the handicapped have improved over the years. However, the staff in two rural sites seemed to construe the LRE provision of PL 94-142 in a rather narrow sense, and the manner in which they conceived of "appropriate special education programming" had not changed significantly since the passage of PL 94-142. At least in part, this viewpoint seemed to be related to the traditional attitudes of staff (both special and regular educators and administrators) about what constitutes appropriate special education placement. They still seemed to prefer serving handicapped students in self-contained classes rather than resource rooms and to have serious reservations about the benefits of mainstreaming. Neither of these LEAs has greatly expanded its continuum of placement options, nor has either engaged in many other practices that would alter the way in which it makes decisions.

Although there is considerable variation in the progress that individual LEAs have made in implementing the LRE provision of the law, most study sites seem to be refining the way in which they conceptualize educating handicapped students in the least restrictive environment.

Effects of the Least Restrictive Environment Provision

The effects of PL 94-142's LRE provision were perceived as positive by special educators at the local level. The major impacts of this provision seemed to be:

- Some expansion in the continuum of placement options available to handicapped students.
- A heightened exposure of a wider range of handicapped students to public elementary and secondary schools.

The increase in the continuum of placement options generally has had a positive effect on handicapped students. There are now more placement alternatives available to the handicapped than there were in 1978-79 in at least half the study sites. The LRE provision of PL 94-142 has helped some LEAs that wanted to expand their continuum of program options to accomplish this goal.

As a result of local deinstitutionalization efforts, the expansion of public school special education programs to accommodate handicapped students formerly served in private schools, and the dispersal of handicapped students out of separate schools and centers into neighborhood schools, a wider range of handicapped students is now being served in public elementary and secondary schools. Many LEA administrators had initial concerns about such a change. For example, one LEA administrator commented: "It was a tremendous shock to the system to provide services to kids with all kinds of handicaps." However, staff have generally adjusted to this transition and view it as mutually beneficial to handicapped and nonhandicapped students. In addition, many seem to think that regular educators have also benefited by at least becoming more aware of the needs of the handicapped through this exposure. As one special education teacher commented: "Other teachers know now what EMR really means. Before, a lot of the teachers thought my kids were grossly retarded. They now perceive that these kids do have some abilities outside of academics." Another special education teacher said that moving the SMR students into a comprehensive high school has taken away the "aura of mystery" about special education. The SMR students also now have better models--their age-appropriate peers.

IV SEQUENCE OF IMPLEMENTATION OF PL 94-142

In Sections II and III, we considered the implementation of many specific aspects of PL 94-142 over the last 4 years. Since each LEA responded to many different provisions in the law and its regulations, implementation meant that a complex series of events occurred in every LEA. In this section, we look at the sequence in which various aspects of PL 94-142 were implemented.

As described in the conceptual framework (see Appendix A), we have adopted a "bottom-up" perspective in this study, viewing the implementation of the law as a process of mutual adaptation between the requirements of the law and the realities of local school systems. Although the law and its regulations explicitly recognized the necessity of phasing in certain aspects, our bottom-up perspective allowed us to describe the actual sequence of events as implemented in local special education systems. Given the multitude of requirements of PL 94-142, LEAs had to set priorities as to what areas would receive the most time, energy, and detailed attention at any point in time. Because the actual sequence of implementation of PL 94-142 was determined primarily by an interaction between the nature of the law's requirements and the basic nature of local school systems, we found that an LEA's response depended on its perception of the different types of requirements or provisions. From the point of view of LEAs, a requirement can vary along dimensions such as:

- The ease with which it can be monitored
- Whether there is a timeline for implementation
- The cost of implementation
- The ease of implementation

- The clarity of interpretation
- The degree to which the provision capitalizes on existing practices, rather than requires major changes.

Assuming that school districts had not achieved the goals detailed in PL 94-142 (as described in Section I), LEAs had to make three types of changes to comply with the requirements: modify procedures (e.g., parent notice and consent, IEPs), expand the scope and comprehensiveness of special education programs and related services, and train personnel. Whatever the sequence of these changes, it would be necessary to implement and integrate them before full implementation of the law--in the sense of its intent to have an individualized, child-driven system--could be achieved.

We observed similarities among many different types of districts in the sequence they followed for implementing the law's requirements. These similarities were further validated and given some generalizability by SEA personnel we interviewed about LEAs other than those studied by SRI. Below, we describe this sequence in terms of the three different types of changes LEAs had to make, i.e., those related to procedures, those related to programs and services, and those related to training. We then discuss how various factors affected this implementation sequence.

General Sequence of Implementation of PL 94-142

Procedural Changes

When faced with the challenge of implementing PL 94-142, the initial focus of LEAs was on procedural changes in response to the law. LEAs focused first on the procedural provisions for the following reasons:

- These provisions, particularly those involving forms, were easily monitored and, in fact, were a focus of many early monitoring efforts. In addition, noncompliance with these provisions could potentially result in a withholding of federal flow-through funds.

- At least one of the procedural provisions (IEPs) had a timeline for its implementation.
- The requirements for the implementation of many of these provisions were fairly clear-cut.
- Procedural provisions were easier for existing staff to implement than those involving programs/services or training.
- Procedural provisions were less expensive to implement than other provisions.

Ease of monitoring and penalties for noncompliance were the obvious factors leading LEAs to focus initially on the procedural aspects of the law. Earlier experience with federal categorical programs has taught LEAs to comply with required procedures to avoid reprimands and penalties.

Overall, the pattern of the implementation of the procedural aspects of PL 94-142 followed changes consistent with the models of the implementation of innovation in education, such as those developed by Hall and Loucks (1977) and Berman and McLaughlin (1978). In these models, implementation proceeds from orientation and adoption, to implementation (marked by mechanical use followed by routine use and refinements), followed by institutionalization. Although it is too simplistic to assume that school districts moved smoothly, at the same rates, or to the same point along this dimension from orientation to institutionalization, we have seen similar patterns of implementation of the procedural provisions of PL 94-142 among the LEAs studied by SRI, as follows.

The 1977-78 school year, the year in which we made our preliminary site visit and one of the first years in which a large initial impact of PL 94-142 was felt, might be characterized as a year in which local personnel confronted the fact that PL 94-142 requirements were going to have to be met and contemplated the problems involved in changing the way things were done. That year seemed to be generally a time of initial <u>orientation</u> to the procedural aspects of PL 94-142.

In the 1978-79 school year, LEAs in very different circumstances made substantial progress in implementing the procedural requirements of PL 94-142, particularly those surrounding the IEP process. That year might be characterized as one in which PL 94-142 procedures and forms were developed and put into place (i.e., mechanical use); staff expended tremendous efforts to implement procedures, and timelines were met. Thus, the letter of the law was met on many of the procedural provisions, and the major activity consisted of efforts to come into compliance with the new law.

In the 1979-80 school year, we saw further evidence of progress in implementation. Procedures that were mechanically implemented in the 1978-79 school year began to become routine and, in some places, were refined and/or streamlined. The procedures were modified to fit better with existing procedures and practices. In addition, the new procedures became more a part of daily routines and were more internalized by staff (i.e., although procedures were originally perceived as an external imposition, staff began to follow them in a voluntary and self-guided manner, and to feel that the procedures represented "the way it's done"). Berman and McLaughlin have termed this process "mutual adaptation."

By the last 2 years of SRI's study (1980-81 and 1981-82), the procedures specified by PL 94-142 were generally well institutionalized as part of the special education systems of LEAs. That is, they had become a standard and accepted part of the special education referral-to-placement process. The procedural provisions of the law then commanded less time and attention once the necessary changes had been made and the procedures institutionalized.* In addition, changes in procedures per se were not as

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* This does not imply, however, that all the procedures would continue to be done exactly as they are currently if the requirements for them were dropped. Changes in external factors would imply further adaptation.

resource dependent as other kinds of changes.* Thus, the fiscal constraints of the last few years have had little impact on the already institutionalized procedural aspects of PL 94-142. In 1981-82, special education administrators in two sites summed up this institutionalization as follows:

> PL 94-142 is a force that is still there. Like any other thing, first you think of it as separate, but then you get used to it after a while. The procedures become routine.
>
> This year, everything runs smoother....There are few problems or changes. Things have stabilized. People understand the regs. Parents know what's going on now and know the procedures....There are fewer parent complaints. Teachers are more comfortable.... Three to four years ago, I wouldn't believe it would be so smooth....I wouldn't have expected it to be as accepted.

Although the implementation of the procedural provisions of PL 94-142 all followed the pattern of implementation described above, and commanded little time and attention by the last 2 years of SRI's study, all of these provisions did not command the same attention initially. However, it is of interest that none of the procedural provisions was ignored; that is, all of them were addressed to some extent in the LEAs. The initial focus of time and attention on the various procedural provisions depended on what the provision entailed, for example:

- Whether the procedure was new or could build on previous procedures.
- Whether the procedure was required by a specific date.

Below, we describe the initial LEA emphases for the various procedural provisions of PL 94-142, as well as the general pattern of implementation over time.

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*It is less expensive to develop new forms and reallocate personnel time than to allocate funds and hire staff for new programs and services.

Provisions Receiving Most Initial Emphasis

Consistently, we found when we first visited the study sites that the IEP provision of PL 94-142 received the most initial attention from LEAs. For example, the major activities described to us during our first school-level interviews pertained to IEPs. In addition, implementing IEP requirements initially consumed more time for more staff than any other procedure required under PL 94-142. By the 1978-79 school year, we found that staff in all LEAs had written IEPs for all children receiving special education and related services.

LEAs initially gave the most attention to the IEP provision for several reasons. The main reason seems to be that the IEP provision resulted in a monitorable document; in fact, many early monitoring visits checked on compliance in the use of proper IEP forms and procedures. In addition, a possible withholding of federal flow-through funds could result from noncompliance. The IEP provision also had a specific date associated with it; IEPs were required to be in place by October 1, 1977. In addition, IEPs initially commanded a large amount of time because LEAs had to do an extremely large number of IEPs, and there was often uncertainty associated with them (e.g., it was unclear to many people whether IEPs were to be instructional plans). Finally, IEPs were also very high in priority because IEPs were new to most LEAs and required districts to undergo many major changes. That is, to many districts, the concepts of multidisciplinary team meetings and individualized plans were new. Although other districts had been required (generally by state law or regulation) before PL 94-142 to do some sort of individual plan, under PL 94-142 the IEP process was more formal and detailed. For most of the other procedural provisions of PL 94-142, most LEAs already had some forms and procedures in place.

As time went on, the IEP procedures and forms were refined, streamlined, and incorporated as routine practice. By the last 2 years of SRI's study, the IEP forms and procedures were generally institutionalized as part of the job of special educators, and generally were less of a focus of attention and concern than they were 4 years before.

Moderate-Emphasis Provisions

In response to several of the procedural provisions of PL 94-142 (such as the provisions for parent notice and consent, Child Find, and due process hearing procedures), LEAs generally had to make only a moderate amount of change. Many LEAs had existing procedures that needed only minor adjustments, refinements, or tightening, to fulfill the requirements of these provisions. For this reason, as well as because they were generally easy to monitor and relatively inexpensive to implement, these provisions commanded a moderate amount of time and attention when PL 94-142 was first implemented. After the necessary changes were made, these procedures commanded less time and attention and became institutionalized as part of special education. Some of these provisions are discussed below.

First, the parent notice and consent procedures generally were easy to implement; most LEAs simply had to modify existing parent consent forms (an apparently simple process which presented certain subsequent and unexpected technical complexities). Thus, the basic parent notice and consent procedures required by PL 94-142 were in place in LEAs by the 1978-79 school year. After that time, few changes were made in the procedures themselves, but they are now used more consistently. Second, as a result of the PL 94-142 mandates, many LEAs made some relatively small changes in their existing Child Find efforts, such as formalizing an informal system or making the existing Child Find activities more systematic. Third, in LEAs where due process procedures were already essentially in place, only minor modifications were required; in others, new procedures had to be put in place, but these often were developed at the SEA level. Thus, in the 1978-79 school year, we found that all the LEAs visited appeared to have hearing and appeal procedures in place. It is interesting to note that the initial number of hearings varied from LEA to LEA. In the first few years of the study, hearings consumed more time in districts with parents with above-average educational backgrounds and income levels, and less time in other districts. However, in all districts hearings lessened over time, as some issues were resolved (e.g., through due process hearings) and districts became better at informal dispute resolution and mediation.

Provisions Receiving Less Emphasis

At least two of PL 94-142's procedural provisions (nondiscriminatory/multidisciplinary evaluation and placement in the least restrictive environment*) initially received little attention from LEA personnel. These concepts already were a part of "best practices" in special education. In general, LEAs felt that they were already fulfilling these requirements and, in the absence of external pressure, made few changes in response to these mandates. However, there was wide variation in LEAs' interpretation of these provisions (see Section V, subsection on "Quality"). These procedures then became institutionalized as part of special education (although they generally were fairly well institutionalized even before the law's passage).

This pattern of implementation was true both for nondiscriminatory/multidisciplinary evaluation and for placement in the least restrictive environment. As one example, although mainstreaming is not specifically mandated by PL 94-142, we found that the most common interpretation of the least restrictive environment provision of PL 94-142 was "mainstreaming," i.e., placing handicapped children who were in self-contained special education programs back into regular classrooms for some part of the school day. This early understanding of mainstreaming was already a common concept and practice before PL 94-142, and thus the law did not motivate LEAs to make significant changes. That is, personnel in LEAs that traditionally did much mainstreaming, as well as in those that traditionally did not, stated that they initially put little time and effort into implementing mainstreaming because they already were doing it when the law was implemented; thus, neither type of LEA significantly increased the amount of mainstreaming because of PL 94-142. These mainstreaming procedures are now an institutionalized part of special education.

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* In this subsection, we discuss a limited view of the least restrictive environment provision (mainstreaming); in the next subsection we address other aspects of the provision (e.g., expansion in the continuum of program options).

Summary

The procedural provisions of PL 94-142 were put in place very quickly after the passage of PL 94-142. Initially, some commanded a high degree of time and attention, and some did not; this difference depended mainly on whether the LEAs had to do something new and different or whether only modification of old procedures was needed. Once these procedures were put in place, they quickly became institutionalized as part of special education. Because these types of procedures are generally not very much affected by fiscal constraints, they have not been markedly affected by the fiscal cutbacks in the last 2 years.

However, although the procedures and forms required by these provisions are now institutionalized as part of special education, the intent of PL 94-142 cannot be met unless they are integrated with the expansion in special education programs and services, as well as with inservice training.

Changes in the Scope and Comprehensiveness of Special Education Programs and Related Services

As described earlier, in response to PL 94-142 most LEAs increased the scope and comprehensiveness of their special education programs and related services; i.e., LEAs extended SEARS to children of different ages and handicapping conditions, and met the LRE mandate by expanding the continuum of available program options. The provisions for SEARS and LRE comprise general concepts and goals, rather than procedures. Thus, these provisions followed a path of implementation different from the one described above for the procedural provisions. Because they are less procedural, we can examine separately the implementation of the concept/goals of these provisions and the implementation of the programs and services necessary to fulfill these goals.

LEAs turned their attention to these areas after they had completed their initial compliance with the procedural provisions. There were several reasons for focusing on these areas second:

- Compliance with these provisions is very hard to monitor because the provisions do not involve procedures or forms. For example, there is no clear-cut rule that specifies the "correct" continuum of options, or the "correct" percentage of handicapped children in certain settings.
- It is generally expensive to implement these provisions. To serve children of different age ranges and handicaps, or to increase the range of options for handicapped students, it is necessary to add special education programs, related services, and personnel.
- The requirements of these provisions are more vague than those of, for example, the procedural provisions; thus, their implementation depends on interpretation, attitudinal factors, and state-of-the-art questions (e.g., regarding "appropriateness").

However, in contrast to the pattern for the procedural provisions, LEAs have not decreased the time and attention they have devoted to these provisions over the last 4 years. Their pattern of implementation was as follows.

First, the concepts and goals underlying these provisions were adopted as part of special education. This adoption happened very quickly in most LEAs. In some LEAs, these concepts were already in existence before PL 94-142, and the law just reinforced them. In other LEAs, they were relatively new, but they were quickly adopted, internalized, and institutionalized. Therefore, staff in most LEAs quickly began thinking and talking in terms of these concepts; i.e., people now talk more about the "least restrictive environment," think more about individuals, consider different handicaps more, and so forth. It is important to note that these concepts mean very different things in different places; however, because of the law's mandates, all LEAs seem to have somewhat changed their way of thinking.

The institutionalization of these goals and concepts is not the same as the expansion in programs and services needed to fulfill these goals.

Therefore, after the concepts were institutionalized and the goals were set, LEAs began to expand programs and services in order to fulfill these goals. In the 1978-79 and 1979-80 school years, we observed LEAs well on their way to achieving these goals. For example, LEAs expanded programs to serve children of different ages (e.g., preschool) and handicaps (e.g., the more severely handicapped). In addition, most LEAs worked to expand their continuum of program options.

The implementation of these changes, however, is very dependent on the availability of resources. Therefore, when fiscal constraints became more apparent (approximately 2 years ago) with cutbacks in state/local resources and uncertainty about future cutbacks, these constraints had the effect of interrupting the implementation of these PL 94-142 requirements. Thus, in the 1980-81 school year, we found that the rate of expansion of programs and services slowed dramatically as LEAs struggled to maintain the status quo and eligibility criteria began to tighten. In addition, there was a slowdown in the expansion of a continuum of program options as fiscal constraints caused the slowdown of program expansion. In 1981-82, the trend continued; we saw LEAs making cuts mostly in related services rather than programs but also found our first evidence of cuts in special education programs.

In sum, as PL 94-142 was implemented, progress initially was made in LEAs in terms of expanding programs, services, and the continuum of program options. For example, programs expanded to children of more ages and handicaps, more of the same programs were added, related services were added, and the continuum of program options was expanded. This progress was made in districts of all types (i.e., in those that already had many programs, services, and options, as well as in those that had few). However, a lack of resources generally interrupted the smooth implementation of these aspects of the law. (In some districts with many program options, state-of-the-art considerations also interrupted this flow; for example, one district is currently struggling to define the range of options appropriate for severely emotionally disturbed adolescents.) Thus, although the

concepts and goals of increasing the scope and comprehensiveness of programs and services are now well institutionalized, the achievement of these goals has not occurred and is still a high priority in LEAs.

Training

Another action that is necessary for the successful implementation of the overall goals of PL 94-142 is the training of personnel. To achieve integration of procedures and programs, it is necessary to train both regular education and special education personnel on procedural and substantive issues, as well as to change attitudes. PL 94-142 recognized this need by requiring that states develop a comprehensive system of personnel development in which LEAs must participate. The implementation of this goal also followed a path different from those previously described. That is, systems of personnel development existed in most, if not all, LEAs; thus, LEA personnel did not have to accept any new concept. It was necessary for LEAs merely to change the content of their inservice training, and to coordinate it with the state's system.

Over the last 4 years, state systems of personnel development have never commanded much attention at the LEA level, for at least two reasons. First, the SEA, not the LEA, had the task of developing this system. LEA participation often meant attending regional events put on by the SEA. Second, LEAs that received inservice funding from the state usually added it to their existing inservice efforts.

LEAs put little time and attention into overall inservice training, whether provided through the state or through the district, when PL 94-142 was first implemented. Most of the training provided concerned an orientation to the law and its procedural aspects. Although district personnel tended to say that training was important, LEAs generally placed more emphasis on changing procedures and increasing the scope and comprehensiveness of special education programs and services. One reason

for this is that inservice training was (and is) often viewed as ineffective and of little use. In addition, the other changes in response to the law (i.e., procedural changes, changes in the scope and comprehensiveness of programs and services) generally have been considered more important and visible (e.g., to parents or SEA monitors), as well as specifically required and easy to monitor. There are also several disincentives to inservice training, including union rules and the problems of gaining release time for teachers. Thus, there seems to have been the feeling that training could be put off.

One might expect that districts could turn their attention to training after the procedural aspects of PL 94-142 were implemented and LEAs were well on their way to increasing the scope and comprehensiveness of programs and services. However, the fiscal constraints that interrupted the expansion in programs and services also inhibited the expansion of training. Inservice training seemed like a luxury when districts faced cuts in services and programs and personnel layoffs; when cuts must be made, districts would rather cut training before cutting programs and services. For example, a principal in a district facing cutbacks said, "[inservice] funds could be better applied directly to classroom assistance." Thus, the cutbacks reduced money for inservice training, and it received little attention.

In sum, continually pushing inservice training aside seems to pose an impediment to the successful implementation of PL 94-142. To implement the law successfully, it seems necessary to train personnel before the procedures and programs implied by the law are implemented. However, there have been no incentives to place great emphasis on inservice training. The special education director in one LEA echoed this point: "We haven't made the growth [we could have made], and it's the result of not starting slow--there was not enough preparation and training." In addition, formal inservice training as currently conceived may not be the answer; one administrator expressed the view that he was "not sure more formal inservice will help" because inservice efforts had never really been successful.

Variation in the Sequence of Implementation of PL 94-142

In general, the sequence of implementation of PL 94-142 was not affected by differences in LEA demographic characteristics, such as the rural/suburban/urban nature of the LEA jurisdiction, the nature and size of the handicapped population, the socioeconomic status (SES) of the parents in the community, or the level of resources of the LEA. That is, LEAs of very different demographic makeups showed the same general sequence of implementation; the sequence depended primarily on the interaction of the nature of the law's requirements with the basic nature of LEAs.*

Some other factors did shift the general sequence in which LEAs implemented PL 94-142. These factors include court cases, state law and regulations, SEP/SEA monitoring, local leadership, and community pressure. Factors such as these could dramatically alter the amount of time and attention that LEAs gave to various provisions of the law. Below, we present several examples illustrating some exceptions to the sequence described as generally characteristic of LEAs.

First, we have seen some variation in the relative amount of attention given by LEAs to the various procedural provisions of PL 94-142. In one LEA, a consent decree from a court had a pervasive effect on special education. The consent decree was based on some of the same principles as PL 94-142 (in fact, PL 94-142 was one of several laws referenced in the consent decree), but it had the effect of reordering the LEA's priorities because the IEP procedures were not mentioned in the decree. Thus, whereas IEP procedures initially received the most attention in most LEAs, this district, although it could not ignore IEPs, had to devote more

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* Although demographic factors did not affect the general sequence of implementation, demographic factors did have other effects on the implementation of PL 94-142. These effects are described in Section VI.

time and attention initially to other areas. For example, changes in nondiscriminatory/multidisciplinary evaluation, which received less early attention elsewhere, became a focus of attention in this LEA as a result of the consent decree.

Several LEAs paid more attention to nondiscriminatory/multidisciplinary evaluation than the others did:

- In one LEA, state law and regulations specifically addressed themselves to the nondiscriminatory/multidisciplinary evaluation area. State law required districts to establish a multidisciplinary approach to evaluation and specified new roles, new procedures, and so forth. This LEA thus initially had to devote much time to changing its evaluation procedures. This factor did not influence a second LEA in the same state that had already been doing evaluations in nearly the required way.

- In an urban LEA in another state, the lack of an adequate nondiscriminatory/multidisciplinary evaluation system led to the reopening of a court case. There, evaluation initially commanded a great deal of time and attention, and a special system was designed to address this problem area. Once the system was in place, less time and attention was then taken up with evaluation.

- In one rural LEA, the evaluation provision of PL 94-142 initially commanded little time and attention (as was the case in most LEAs), but in 1981-82, state monitoring has resulted in their paying more attention to this area.

Most LEAs initially spent very little time on implementing the Child Find provision, because they already had an informal network of referrals in place. In one urban LEA, however, SEA monitors criticized the LEA's outreach to public agencies as insufficient. As a result, Child Find activities received more emphasis in 1981-82, and administrators were planning a formal Child Find procedure.

In contrast to the general implementation sequence, one LEA had to divert much of its early attention to due process hearings. This LEA had more than 50 due process hearings in the 1978-79 school year.

We have also seen examples of how increasing the scope and comprehensiveness of special education programs and services has commanded more time and attention in some LEAs than in others, because of various factors. During the 1977-78 school year, the SEA in one state monitored LEAs across the state on LRE. The SEA developed an "LRE profile" on each LEA, based on the information gathered during the monitoring visit (i.e., information on available placement options by age and handicapping condition). LEAs were required to develop LRE corrective action plans, and the SEA monitored these periodically. As the state special education director stated, "We used PL 94-142 to establish policies to expand placement options for kids." This monitoring led at least one LEA in the SRI study to spend a great deal of time and energy initially on expanding its programs and services and on taking over the educational responsibility for some students in welfare residential facilities.

Finally, we saw some examples of a strong emphasis on inservice training. In one urban LEA, a court directive required the LEA to institute districtwide sensitivity sessions in an attempt to change personnel attitudes about special education. During the year the district was under this directive (1979-80), inservice training was a very high priority. In a suburban LEA, the special education director felt that the reasonable approach to the implementation of PL 94-142 was to train personnel first. He felt that proceeding with implementation without training creates problems "like an assembly line that never gets retooled for next year's model." Because the district had enough money to do so (with a combination of state and local money), much attention was paid to inservice training in the beginning years of the law's implementation. Time and money were devoted initially to training both regular and special education personnel in procedures, IEP writing, and so forth. As a result of this emphasis, IEPs received slightly less attention initially. In fact, this district had prescriptive plans for special education students before PL 94-142. Although IEPs were required to be in place by October 1, 1977, this LEA stamped "IEP" on the prescriptive plans during the 1977-78 school year and used that year to train personnel. Only after this training was completed were the first new IEPs developed (for the 1978-79 school year).

Summary

Assuming that LEAs had not achieved the goals of PL 94-142 when it became a federal mandate, the law and its regulations meant that LEAs had to make changes in procedures, the scope and comprehensiveness of special education programs and related services, and training. We observed a general sequence in which LEAs implemented PL 94-142, although various factors caused some variation. First, LEAs addressed the procedural provisions of the law and made the necessary changes and refinements; the procedures then quickly became institutionalized into the special education system. Second, LEAs turned their attention to increasing the scope and comprehensiveness of special education programs and services to provide SEARS in the least restrictive environment to children of different ages and handicaps. These concepts and goals quickly became an institutionalized part of special education (if they were not already). However, a lack of resources (as well as some remaining state-of-the-art problems) slowed progress in increasing the scope and comprehensiveness of programs and services; thus, progress in this area is still an important goal. Finally, because of more pressing demands, limited resources, and state-of-the-art issues, inservice training was rarely a matter of urgency to LEAs. In sum, LEAs still have not achieved the integration of procedures, programs/services, and training necessary for the full implementation of PL 94-142 (i.e., for the achievement of an individualized, child-driven system).

V OVERALL EFFECTS OF PL 94-142

In previous sections, we have discussed trends in the implementation of PL 94-142. In this section, we summarize the overall effects of the law and its regulations on local education agencies. First, we discuss the overall effects of PL 94-142 on LEA special education systems. Second, we discuss the effects of the law on various local personnel, parents, and children. We also address the trade-off between regular and special education. Finally, we describe the overall positive and negative effects of PL 94-142 from the point of view of special education and special educators.

Effects of PL 94-142 on Special Education Systems

As described in Section IV, PL 94-142 has had two major effects on special education systems over the last 4 years. First, in response to PL 94-142, LEAs made many procedural changes. For example, LEAs have implemented such procedural requirements as Child Find, parent notice and consent, multidisciplinary evaluation, IEPs, and due process. Over the past 4 years, LEAs have incorporated these procedural requirements into their special education systems.

LEAs have also increased the scope and comprehensiveness of their special education programs and related services. For example, districts expanded programs and services to handicapped chidren at the preschool, elementary, and secondary levels, particularly for SLD, SED, and SMR children. Half of the LEAs in the SRI study have also increased the range of handicapping conditions they recognize and serve. In these districts, programs and services have been extended primarily to include the more severely handicapped (e.g., TMR, SMR), or those with low-incidence handicapping conditions. In general, LEAs have made some progress in

providing a variety of SEARS and placement options to a wider range of handicapping conditions, but fiscal constraints have slowed progress in this area.

Effects of PL 94-142 on Various Local Personnel, Parents, and Children

Effects of PL 94-142 on LEA Administrators

PL 94-142 has had both positive and negative effects on LEA administrators. In general, we found that the overall impact of PL 94-142 on LEA administrators was positive, especially for special education administrators.* For the most part, the federal mandate gave LEA special education administrators the "clout" to expand their service delivery systems. Also, PL 94-142 was enacted at a time when most of the LEAs in the SRI study were ready to expand their service delivery systems. The law gave them the necessary leverage to implement what they had already planned to do. In many ways, the federal law enabled them to move toward their special education goals faster. From the LEA special education administrators' perspective, we heard the following:

> PL 94-142 gave us more funds to get services. It gave us the clout to institute the services we had wanted to do in the past.
>
> PL 94-142 increased special education's clout to get money and attention. It gave us the power to equalize regular and special education differences.
>
> We used to be peasants. Now we are nobility.
>
> The law gave us much more leverage.
>
> Things got changed a lot more rapidly because of PL 94-142....We wouldn't be near where we are now as far as positive attitudes people have about serving the handicapped.

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*It should be noted that we talked primarily with special education administrators, not school board members or regular education administrators. Our findings thus reflect the special educators' perspective.

In at least three districts that were lagging far behind in meeting the needs of handicapped children in 1978-79, PL 94-142 forced administrators to address the great unmet needs of these children. As special education administrators in these LEAs commented in 1981-82:

> PL 94-142 was a real gun pointed at us.
>
> It was a tremendous shock to the system to provide services to kids with all kinds of handicapped conditions. It has been helpful to have deadlines and penalties. We always seem to function on a crisis basis.
>
> The law said that you must...It has been overwhelming.

For the most part, the special education units of LEAs gained greater visibility within the districts' administrative organizations. PL 94-142 legitimized special education and increased the power (including budgetary) of special education units relative to other sectors of an LEA educational system. In some districts, this greater visibility and power created opportunities for effective special education administrators to advance their careers within the system. For example, one LEA special education director had become an assistant superintendent by 1981-82. In contrast, special education administrators in a few districts could not cope effectively with the increased demands posed by PL 94-142's requirements. In one LEA, the school board opted for a new special education director more familiar with the increasingly bureaucratic nature of special education administration.

Given special education's greater visibility, regular education administrators have generally become more aware of special education and some of the issues associated with it. In one rural district, an administrator with special education responsibilities commented:

> Some of our colleagues had to be dragged into knowing that special education is here to stay. Most now recognize that special education is something that we have to deal with.

Despite some initial resistance to modifying their roles and responsibilities vis-a-vis special education, most LEA regular education

administrators have now accepted the basic concepts of the law. However, there is still some resentment among regular education administrators regarding the costs associated with special education. Although these administrators understand the need to protect the rights of handicapped children, they think that progress has been made through an excessive commitment of time and local resources. As one regular education administrator commented: "It's an extremely costly process in time and dollars and resources to deal with a small percentage of the population."

Certainly, from the special education administrators' perspective, the most negative impact of PL 94-142 implementation has been the increased paperwork burden, as well as some of the ambiguities associated with the provision of related services. Although most administrators acknowledged that some of the increased paperwork required by PL 94-142 was necessary, they still found the burden excessive. One special education director summed it up concisely:

> PL 94-142 itself helped us or made us sharpen our skills or procedures [e.g., Child Find, parent notice and consent]. At the same time, it added the burden of forms, monitoring, and records that borders on the ridiculous.

Two other negative effects were mentioned in fewer than half of the study sites. One was that PL 94-142 appropriations never reached the level for which they were authorized. Special education administrators were frustrated by the federal mandate to provide a free, appropriate public education to all handicapped children without adequate federal assistance. As one special education director commented: "The law said you must--you must...yet never followed through with appropriations." In addition, administrative burnout was a negative effect expressed by some LEA special education administrators. One district superintendent summed it up as follows:

> We have a generation of people who have done 10 years of work in 4 years. Most administrators are weary. Change was so rapid that it was almost overwhelming.

Effects of PL 94-142 on School Personnel

In general, the positive effects of PL 94-142 on school personnel (e.g., principals, teachers) have outweighed the major negative effect, increased paperwork burden, which has been perceived as greater at the school level than at the LEA level. Both positive and negative effects are discussed below.

Principals

When we visited the study sites in 1978-79, we found that principals in some LEAs were more involved in the decisions affecting programs and services for handicapped children than they had been before PL 94-142. Not all LEAs delegated the responsibility of representing the district to principals (although many did, especially at the elementary level). Also, many principals to whom responsibility was delegated did not feel they had time to play this role, given other new responsibilities for special education (e.g., sending out parent notice and consent forms, meeting with parents). Principals generally reported that they were more aware of the LEA's special education programs and the nature of the classes and handicapped children, and we have found this to be so during the past 4 years.

By 1981-82, the involvement of principals in educational decisionmaking still varied a great deal by LEA and across schools within LEAs. However, school personnel in most LEAs reported that principals have gradually increased their sophistication regarding PL 94-142 and their awareness of the nature of the special education classes in their schools. In some LEAs, principals have become more accepting of handicapped students. In large part, greater awareness and acceptance have been facilitated by dispersal of more special education classes across districts, which has increased principals' exposure to a wider range of handicapped students. Principals in several LEAs commented as follows regarding the positive effects of PL 94-142 on principals:

> Principals are more aware of how to handle all kids....They take more interest than in the past.
>
> The biggest effect of PL 94-142 was to bring special education to the attention of all building personnel. It made principals more aware of special education.
>
> PL 94-142 has made everyone more sensitive to the needs of special education students. The law has been a real eye-opener for regular educators.

Although we generally found that principals have gradually increased their sophistication regarding special education, PL 94-142 has had minimal impact on principals in at least two rural districts. The special education directors in both of these LEAs have played the dominant role in special education matters. The principals continued to rely on their traditional roles and have resisted taking a more active role in special education matters in their schools.

Despite refinement and streamlining of the IEP process over the past 4 years, the increase in the overall paperwork burden (e.g., IEPs in combination with parent notice and consent procedures) that accompanied PL 94-142 has changed little over time and has been perceived as the major negative effect on school personnel in almost all LEAs. In an urban LEA, one elementary school principal commented on the overall effect of PL 94-142:

> I spend more time on paperwork for our 44 special education kids than I do for the other 450 kids in the school. It's mandated and you have to do it.

In another urban district, which has undergone many changes at both the LEA and school levels over the past 4 years, some principals have become hostile about the time and effort they have had to direct toward special education matters. Thus, the overall paperwork burden remains a problem for principals in most LEAs.

Regular and Special Education Teachers

The law's LRE goal implies that regular classroom teachers would assume increased responsibility for teaching handicapped children and have more interaction with teachers and parents of handicapped children. Although we have seen some increase in mainstreaming efforts over time, we also found that the day-to-day demands of teaching, as well as increased regular class size, have often made it difficult to provide coordinated mainstreaming activities. In general, regular education teachers have become much more aware of special education and more accepting of handicapped children. However, resistance to mainstreaming among regular educators persists to some extent. In one LEA, for example, regular teachers have class sizes of up to 35 students. These teachers are resistant to mainstreaming efforts, but also are resentful of special education teachers who have only 8 students and an aide.

Most special educators thought that PL 94-142 had helped to open communication between special education teachers and parents and that special education teachers were more accountable for what they were doing with children. The law's major effect on special education teachers, however, has been the increased time requirement and paperwork burden. Although the IEP paperwork burden has eased, in general, over time, the overall amount of paperwork burden associated with special education at the school level remains excessive. As one teacher in a small rural LEA noted: "I am sometimes fed up with the paperwork...let us teach."

Effects of PL 94-142 on the Parents of Handicapped Children

In general, the positive effects of PL 94-142 on parents have outweighed the negative effects. In most LEAs, parental awareness of their rights under PL 94-142 has been heightened over the last 4 years. In addition, the law's formalization of parent-school contacts has increased such contacts and has helped parents to have a greater understanding of what is going on in the schools (i.e., in their child's special education program). A school

psychologist in a rural district summed it by saying, "Parents are quite knowledgeable about special education now."

PL 94-142 has given more active (and, generally, better-educated) parents a tool with which they can exercise their due process rights under the law. Although many LEA administrators acknowledge the precedents for PL 94-142's delineation of these rights (i.e., real abuses of the rights of children), a few regret the adversarial nature of some school-parent interactions since the passage of PL 94-142. For example, in an urban LEA, where parents have traditionally been active, the special education director felt that the law turned a cooperative relationship into an adversarial one: "the law alienated parents and the schools." In several districts that have experienced considerable due process hearing activity, LEA administrators tended to view increased awareness of parental rights as "opening Pandora's box." Administrators in one large LEA thought that parents had used due process procedures to try to make the district pay for educating children in private schools (i.e., unilateral private placements). As one special education administrator commented: "Some parents have used the law as a club over the LEA to get services that we don't feel are necessarily the responsibility of education (e.g., orthopedic shoes)." In a suburban district where parents have always had high expectations, special education administrators thought that the law had given parents more clout. They felt that parents had made demands on the schools and the district that "parents in other places wouldn't dream of asking for."

In a few LEAs where parents have tended to be passive or apathetic, PL 94-142 had a minimal effect on them. Although parents in these districts are probably better informed than before about special education and what the schools can offer handicapped children, such awareness is not nearly as high as in sites with parents who are more active. For example, two rural sites still report a problem of parental refusal of special education because there is still a stigma associated with it. In an urban site, where parents had been inactive and apathetic toward the schools, parents have remained complacent and have failed to take advantage of the rights accorded to them under PL 94-142.

Although parents' contact with the schools has increased as a result of the law, the quality of parental involvement generally has not increased to a great extent. Parents tend not to make contributions that significantly affect decisions concerning appropriate programs and services for their child. However, the higher level of parental awareness of special education and greater knowledge of their child's program can be attributed largely to PL 94-142.

Effects of PL 94-142 on Handicapped Children

In addition to requiring special education and related services for all handicapped children, the law places a particular priority on providing programs and services for children who had not been receiving any services (i.e., the unserved) and for those who had been receiving inadequate services (i.e., the underserved). Perhaps one of the most visible initial impacts of the law that we found in 1978-79 was its effect on the scope of SEARS provided. All LEAs had moved to expand programs and open up their special education delivery systems to additional beneficiaries. We have discussed progress in meeting the SEARS mandate in Section III.

Although some resources to serve the unserved and better serve the underserved came from the federal government under PL 94-142, no LEAs have sufficient resources to guarantee a free and appropriate public education to all handicapped children from 3 through 21 years of age. In spite of this lack of resources, the broad consensus in the districts that SRI has studied is that handicapped children are the primary beneficiaries of PL 94-142. In most LEAs, children who need special education were identified earlier, and the level of programs and services provided to those children has been raised over time. Although it is debatable whether "more services" means better services, most people at the local level believe that they have improved the quality of programs and services as well. As various LEA special education administrators told us:

There are more services and kids are better off.

Programs have grown tremendously, and I have to believe that services are better.

The impact on kids has been 98% positive...We're providing services to those we wouldn't be otherwise.

The level of services has increased both with regard to breadth and depth.

As a result of PL 94-142 dollars, we have improved the quality of our special education program.

For the most part, children who had been unserved previously are now being served. Handicapped children who had been underserved are being served more appropriately now than they were 4 years ago. However, as we have seen in 1981-82, diminishing resources have begun to affect the level of progress that has been achieved.* Thus, some children still need special education and related services but are not receiving them.

The other major positive impact on children has been the increased contact between handicapped and nonhandicapped children and the resulting acceptance of the handicapped students. In addition to some increase in nonacademic (art, music, physical education) and academic mainstreaming efforts, more handicapped children are now being served in public school settings rather than in separate facilities or centers, institutions, or private schools. In general, there has been a positive change in attitudes, although this change has not occurred without resistance. Nonetheless, the comment of a high school principal, frank about his own attitude change over the past 4 years, is not atypical. He indicated that he had once led an effort to keep an orthopedically handicapped child in a wheelchair from being placed in his school. By 1981-82, he thought that having such pupils in his school was "a plus to the campus."

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*As we discussed in Section III, progress slowed in 1980-81 and SEARS actually contracted in four LEAs in 1981-82.

In the majority of the study sites, LEA and school-level personnel mentioned no negative effects of PL 94-142 on children. However, in some LEAs, people expressed concerns centering on the labeling of special education children and the potential negative effects of mainstreaming. In three rural sites, labeling a child "special education" still bears a stigma. In these traditional rural areas, there is still a need to change attitudes about handicapped children. Also, as discussed in Section II, not all the problems of balancing appropriate services and services in the least restrictive environment have been solved. Some people continue to have concerns about inappropriate mainstreaming and its potential negative effect on handicapped children. They are concerned about mainstreaming a child before he/she is ready for such a situation, or mainstreaming a child into a regular education classroom with a large class size, where the special education child does not receive the necessary individual attention.

Trade-Off Between Regular and Special Education

When PL 94-142 was initially being implemented, we expected that there might be some backlash on the part of regular education administrators and school-level personnel against the attention (i.e., money and clout of the law) that was being paid to special education. Over the last 4 years, we have found little evidence of major backlash against special education. In 1981-82, however, we did focus on whether there had been any trade-off between special education and regular education. We examined whether, from the LEA special education administrators' perspective, special education's progress had been made at the expense of regular education--fiscally, programmatically, or in other ways.

Fiscal Trade-Off

In general, we found that special education has been able to "make it on its own" in the study sites. That is, the local special education systems we observed have so far been able to use PL 94-142 and state

reimbursements to finance programmatic growth over the past 4 years. However, we did find at least three districts where special education has cut into the LEA general fund/budget to a limited extent. Two of these sites were rural LEAs with limited local and state resources. As a spokesman from one of these LEAs commented: "Even though special education gets its own funds, we still have to dip into general funds to provide for special education." The other rural district, because it did not receive as much discretionary money as it had applied for during the past 2 years, had to divert some money from its general fund to provide its special education programs and services. Finally, in the third site, a resource-rich suburban district, the common school board perception has been that some local dollars have been taken away from regular education to be allocated to special education. Although that may be true in a few instances, the board members seemed to realize that the special education administrators "could have gone more overboard" (i.e., they have exercised restraint in budgetary requests). In all three of these districts, backlash from regular administrators and educators, as well as from the local community, could be described as minimal.

In several LEAs we visited in 1981-82, there were concerns about special education's continuing to remain self-sufficient in the face of anticipated state and local shortfalls in funding for 1982-83. In California, for example, the effects of Proposition 13 will affect LEAs more adversely in the 1982-83 school year. Unless LEA special education administrators make cuts in their own budgets, general education funds will be used to meet the legal mandates of special education. If special education budgets are not cut, resentment and backlash is expected from LEA regular education administrators. In Florida, when a new reapportionment formula becomes effective in 1982-83, a shortfall in state funds is anticipated for some LEAs. In 1981-82, the LEA administrators were already looking at how cost-effective regular and special education programs were. Programs that are not cost-effective will probably have to be cut back to some extent. In a third state, an urban LEA has historically faced tremendous fiscal difficulties. The rapid expansion of special education that has taken place over the last 4 years has contributed to these

problems. Regular educators have attributed the worsening situation to special education. However, other contributing factors included:

- Continuous loss of the local tax base.
- Declining local enrollment.
- Decrease in state funding levels for both regular and special education.

As a result, special education will face massive cuts in this district in 1982-83.

In general, we have not observed much fiscal trade-off between regular and special education over the last 4 years. Nevertheless, as special education's ability to remain self-sufficient became an issue by 1981-82, several LEA administrators anticipated taking cuts in their special education budgets, rather than using general funds to finance special education.

Programmatic Trade-Off

Other than regular education teachers working with more special education students than they did 4 years ago, there has been little programmatic trade-off between special education and regular education. Regular educators in two large urban LEAs have complained, however, that counseling services have become less available to regular education students. In one district, the pupil personnel services department has had to devote more time and staff to the evaluation of potential special education students in response to PL 94-142. As a result, counseling services to regular and special education students decreased. One LEA administrator commented: "The law is a hammer over our head....We spend time with special education kids and hurt regular kids." Counselors in the second LEA often have devoted at least 50% of their time to special education children. Regular educators resented this and felt that counseling was no longer a service from which "our students" could benefit.

There was one exception to the general trend of little programmatic trade-off between special and regular education. In the large urban LEA that had to decertify three categories of mildly handicappped children from special education in response to SEA action, a major burden was placed on regular educators in 1981-82. Most of the children who were decertified from special education were attending regular education classes. Although we did not discuss the situation with regular education teachers during our visit, we heard from other school personnel that they were experiencing many problems.

Other Concerns Regarding Trade-Offs

The suspension and expulsion of special education students has become an issue across the country.* In Florida, the S-1 v. Turlington case has created tension between special and regular education administrators in the state. Regular education administrators have come to believe that the court case has required all Florida districts to set up a dual system of discipline, which they resent. Special education administrators are concerned that the good public relations that have been generated between special and regular education will be threatened because of this issue.

Factors Related to Effective Relationships Between Special Education and Regular Education

For the most part, special and regular educators have worked well together as special education has changed over the past 4 years. We have not observed much fiscal or programmatic backlash against special education as a result. However, the size of the problem depends largely on each LEA's unique characteristics. The following descriptions from two very different LEAs--one urban and one suburban--provide examples.

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*See Cressey (1982).

In the large urban LEA, special education administrators were faced initially with making great changes in their system as fast as possible in response to PL 94-142 and several court cases. The assistant superintendent's style was to approach regular education administrators with a heavy hand in order to make these major changes. His posture was: "You shall do this within certain dates....Take the class, request a transfer, or retire." Such an approach did not make special education popular in the district. Although regular education has made the necessary adjustments and accommodations to meet the legal mandates for handicapped children, resentment against special education persists.

The suburban district has experienced very little trade-off between special and regular education. Very few changes have had to be made to its special education system over the last 4 years. The special education director has planned just what he thought was necessary to improve SEARS to the district's handicapped children. His annual budget requests to the local school board were well justified and he always had his budgets approved. The school board has continued to view special education sympathetically, despite concerns with diminishing resources. The special education director has avoided conflict with regular education, including the teachers' union. The director and his staff have had time to go out to the schools in this relatively small LEA and work with the regular teachers to handle any special education problems. Change in special education has evolved in a smooth and orderly manner in this LEA.

Overall Positive and Negative Effects of PL 94-142

On the preceding pages, we have discussed the overall effects of PL 94-142 on special education systems (e.g., changes in procedures, changes in special education programs and services). In addition, we have discussed the overall effects of PL 94-142 on various local personnel, parents, and handicapped children. Despite the negative effects of PL 94-142, such as increased administrative time and paperwork burden, and problems regarding the limits of LEA responsibility, special education personnel in all the

LEAs in the SRI study agreed that the positive effects of the law outweighed the negative effects. Primarily, the reason was that the clout, regulations, and money associated with PL 94-142 have increased the capacity of LEA personnel to deliver programs and services to handicapped children over the last 4 years. The major positive effect of the law has thus been an increase in the scope and comprehensiveness of special education programs and services at the local level. Special education administrators from LEAs of varying characteristics (e.g., rural and urban, rich and poor, large and small) shared with us their views about the overall effects of PL 94-142 as follows:

> Yes, you bet [it was worth it]. I remember what it was like before Master Plan and PL 94-142. Programs have greatly improved. So have parent rights. It has definitely had a positive effect.
>
> There's no question in my mind that the good outweighs the bad.
>
> It was definitely worth it in this city...it's been a revolution, especially for the severely handicapped.
>
> PL 94-142 was the only way we could have gotten all our kids served.
>
> PL 94-142 was the lever necessary to get things accomplished.... It needs to be the 11th commandment to serve these kids. If PL 94-142 is repealed, lots of kids will be denied services.

Although special education administrators unanimously agreed that the overall effects of PL 94-142 over the last 4 years have been positive, the types of effect the law had, as well as the "quality" of the resulting special education system, are related to the demographic characteristics of the LEA. We have seen a cluster of demographic features, including the amount of local funds for education, the number and kind of education-related resources (e.g., trained staff, mental health facilities, private schools), and the degree of local support for the schools, that were related to the degree to which an LEA had met the goals embodied in PL 94-142 prior to the law's passage. Some LEAs lagged behind the state of the art in special education in 1978, when our study began. These LEAs had many basic gaps in the scope and comprehensiveness of special education programs and

services, as well as a less individualized special education system. On the other hand, many LEAs already had fairly broad-based special education programs and related services at the beginning of our study. We have seen different types of effect, as well as differing quality of the special education system, in these two types of districts, as follows.

Type of Effect

In those LEAs that had basic gaps in SEARS before the passage of PL 94-142, the major effect of the law was to fill some of these gaps (e.g., providing programs for previously unserved or underserved SLD and EMR populations, and providing basic related services such as speech therapy). We saw at least two types of LEAs in which this was the case. First, some rural sites with traditional attitudes and low levels of resources filled in some basic gaps in SEARS using both the money associated with the law and the clout (including the goal statements as well as the regulations) of the law. Second, basic gaps also have been filled by large LEAs (cities or urban areas) that had large numbers of children with unmet needs (such as unserved or inappropriately served children). These LEAs include large urban LEAs that have suffered from fiscal constraints and cities in states traditionally less responsive to the needs of handicapped children. In these LEAs, the clout of PL 94-142 was the main factor resulting in changes; the money received from PL 94-142 was helpful but less of a factor (in part, because actual funding was less than the anticipated amount).

The law resulted in a different type of change in LEAs that had up-to-date, broad-based special education systems before the passage of PL 94-142. In this type of LEA, the law resulted in the refinement of special education programs and related services. Because districts of this type are relatively rich in resources, the money associated with PL 94-142 had little effect; the major aspect of the law affecting these changes was the law's clout. A spokesman from one such district characterized the effect of the law: "PL 94-142 gave us the clout to expand and refine the

continuum of special education and related services available to children." Another added, "The law greatly enhanced programs."

This pattern of effects corresponds with the way in which PL 94-142 money was used, as described in Section III. That is, LEAs tended to use this money on related services and refinements, unless it was needed for basic programs.

Quality

Demographic differences among LEAs also affected the quality of the procedures, programs and services, and training that were implemented. Before the passage of PL 94-142, districts varied in the quality of special education programs and services, parental involvement, evaluation procedures, etc. For example, some districts had a head start on other districts in the range of program options available and the amount of individualized attention a child received during evaluation. When PL 94-142 was passed, most districts made changes, as described earlier. However, the law did not alter the relative standing among districts. For example, those districts that had a head start continue to have more informed consent, more mainstreaming, a larger continuum of options, more programs and services, better nondiscriminatory/multidisciplinary evaluation, and so forth. The law did not erase these inequalities. However, the most important point is that the law did raise the level of many of these aspects in those districts that had lagged behind.

VI FACTORS AFFECTING THE IMPLEMENTATION OF PL 94-142

In previous sections, we have discussed the implementation of PL 94-142, as well as many of the factors affecting this implementation. The law and its regulations have been a major factor affecting change in special education over the last 4 years. However, from our "bottom-up" perspective, PL 94-142 is just one factor among many influencing the practice of special education. Implementation is determined by many factors and the response of LEAs and their personnel to the requirements of PL 94-142 reflects the circumstances of their daily lives, of which the federal law is only a part.

Factors Affecting Implementation

A major factor affecting special education over the last 4 years has been the basic nature of local education agencies. As described in the conceptual framework (Appendix A), all LEAs, in their role as education agencies and public service bureaucracies, share certain characteristics. For example, as a result of unlimited demand and limited resources, individuals in public service bureaucracies inevitably have to develop coping strategies and make trade-offs. They must allocate resources among programs, redefine or limit clientele to be served, establish routines to handle more individuals in less time, and the like. In addition, special educators must advocate for their students and compete with others in the school system for recognition, rewards, and resources. As we described in Section IV, the interaction between the nature of local education agencies and the nature of PL 94-142 had a large effect on the sequence and pattern of implementation of the law's requirements. It is interesting to note that the commonalities among LEAs (as education agencies and public service

bureaucracies) were quite powerful in determining the sequence that LEAs followed in the implementation of PL 94-142.

We have also seen that factors that vary between LEAs have had an influence on the implementation of PL 94-142. These include both the demographic differences of the LEAs themselves, as well as other contextual factors (e.g., state laws, court cases). The demographic differences seem to have had little effect on the sequence of implementation of PL 94-142. However, as described in Section V, demographic characteristics had a large impact on the degree to which an LEA was at the state of the art in special education before the implementation of PL 94-142, on the type of effect the law had, and on the quality of the resultant special education system. As an example, it is interesting to compare and contrast two districts visited in the SRI study that illustrate the effects of demographic characteristics on the quality of evaluations. One was a small rural district located in a community with low property values and hence low tax revenues. The population of the community is generally of low socioeconomic status and not well educated. There is also a lack of community and parental support for the schools. This district's special education system represented a system lagging behind the state of the art, which needed to make many changes to meet the goals of PL 94-142. Because of extremely limited resources to hire additional staff, as well as a traditional attitude towards the role of the psychologist, evaluation in this district is still conducted mainly by one person, rather than being multidisciplinary. In contrast, we visited a suburban district located in an affluent area with high local taxes. The community is composed of professional, well-educated people who support the schools. This was a district with high-quality programs and services for students with every kind of handicapping condition. Because of the expectations of the community members, extra resources to hire additional personnel, as well as other factors, this district was even able to hire consulting psychiatrists to assist in the evaluation process when appropriate; this district thus can rely on many specialists to give multidisciplinary input to the evaluation.

Other contextual factors have also had effects on the implementation of PL 94-142. For example, in Section IV we illustrated that factors such as court cases, SEP/SEA monitoring, local leadership, state law and regulations, and community pressure could have a large effect on the sequence of implementation of PL 94-142.

Relationship of PL 94-142 to Factors Affecting Implementation

Although various factors interact in unique ways in each site, we investigated the relative importance of PL 94-142, compared to other factors, in causing change in special education over the last 4 years. This helps place the impact of PL 94-142 in perspective.

Federal and State Mandates

Either directly or indirectly, PL 94-142 has been the most important force motivating changes in special education over the last 4 years. Mandates, in general, are a powerful force in motivating change. A special education administrator told us, "Legal mandates get you off the ground; they get your foot in the door."

The federal mandate, in the form of PL 94-142, has had a significant effect, largely because of the legitimacy it gave to education of the handicapped and the clout it gave to special educators and parents of handicapped children (and, in many cases, because of the money associated with it). As described earlier, the main positive effect of PL 94-142 has been to increase the scope and comprehensiveness of special education programs and services, either by filling in basic gaps (in LEAs lagging behind the state of the art) or by refining programs and services (in LEAs with state-of-the-art special education systems). A federal law like PL 94-142, stating national policy goals and backing a service mandate with due process provisions, has a kind of clout that few other mandates or other

factors have. For example, in a large urban district affected by court orders and advocacy pressure, a special education administrator remarked, "94-142 has revolutionized education in this city; we could not have been as successful without the law...When all else fails, we can always fall back on the fact it is a federal mandate."

Although the federal mandate has had this large influence on special education, state law and regulations are also often mentioned as factors that have affected special education. Many of the LEAs studied by SRI are located in states with special education laws and regulations similar to PL 94-142, put in place either before the passage of PL 94-142 or at about the same time. In general, these state laws have not been incompatible with PL 94-142, and in some cases they have had quite similar requirements, particularly in terms of a full-service mandate. These state mandates, in and of themselves, certainly have caused some changes in special education over the last 4 years; however, the federal law gave further legitimacy to the state laws. The state laws would probably have had considerably less impact without the extra authority of a similar federal law. In states where PL 94-142 was implemented before the state law and regulations, the federal law had a clear impact; where PL 94-142 was implemented after the state law, PL 94-142 often just reinforced changes required by the state law. Yet, it seems that, regardless of whether PL 94-142 preceded or followed the state law and regulations, the extra impact of the federal law was a significant ingredient for change.

This point was illustrated in two different states, both with special education laws similar to PL 94-142 that were implemented before the passage of PL 94-142. In one state, education administrators told us that, although most of PL 94-142's provisions were in place before the passage of PL 94-142, there was not the pressure to enforce the state law without the federal law. That is, PL 94-142 caused a tightening of procedures and "gave us more legal clout to carry out [the state] special education mandate." In a rural LEA in another state with a model special education law in place before PL 94-142, personnel told us:

[The state special education law] started the ball rolling...the federal law gave it more impetus.

94-142 has really helped us do what we wanted to do and do it better...94-142 strengthened [the state special education law]...it's always nice to quote the federal law.

Court Cases

Most of the other major factors influencing special education in the last 4 to 5 years are also intertwined with PL 94-142, illustrating the pivotal role of PL 94-142 in changes in special education. For example, one major factor influencing the direction of special education in some of the LEAs studied by SRI has been court actions. By their very nature, court decrees or rulings cannot be ignored, so that in LEAs where major court decisions have had pervasive influences on special education, local personnel viewed the court as at least as important an influence as PL 94-142. However, in some instances, court decisions (both the far-reaching and the less far-reaching ones) were based on interpretation of this public law. In other instances, they had the effect of tightening the authority of PL 94-142. In brief, PL 94-142 partly had a large effect on special education by operating through the courts. Three examples of this follow.

In a state which traditionally gave little support to special education, the issue in a court case was nonprovision of special education to some students, the provision of an inappropriate education to others, the isolation of children in programs, and the nonprovision of mechanisms by which the decisions of various school officials should be reviewed. A consent decree, issued at about the same time as the implementation of PL 94-142, had a great impact on the special education system in an LEA SRI studied in this state. The consent decree cited several federal laws, including PL 94-142.

In another LEA, a consent decree (and subsequent open hearings), as well as other court cases, have had a large impact on the special education

system over the last 4 years. For example, the director of special education in that LEA said that the legal cases have "given me the leverage to move faster." Another administrator added that "the court mandates brought about by the advocates let us accomplish things...introducing change is a problem itself." However, although the effects of these cases cannot be minimized, PL 94-142 was related to their influence. For example, the consent decree was issued before PL 94-142, but it provided an administrative structure for the implementation of PL 94-142 regulations such as parental involvement, due process, and IEPs. In addition, the rulings in the open court were often based directly on PL 94-142. An administrator summed up the effect of PL 94-142 vis-a-vis the court rulings as follows:

> PL 94-142 provided us with structure and motivation. It gave us an ideal. Nothing would have occurred without PL 94-142. We would have just had a series of fragmented consent decrees. 94-142 is a 'best practices mandate.' It forced us to begin to look at comprehensive long-term planning.

Finally, we have an example of a state in which a court case (which went up to the state supreme court) mandated a free and appropriate public education, based on the state law and constitution. Even though this court decision was reached before PL 94-142 was enacted, the federal law was perceived as giving more clout to the court decision and hastening its implementation.

Other Major Factors

Another influential factor in some LEAs (particularly those located in relatively wealthy, well-educated communities) has been the actions of demanding parents or advocacy groups, either in bringing court cases or in directly forcing changes in the special education system. Pressure from parents or advocacy groups often existed before the passage of PL 94-142. However, even here we see the indirect effect of PL 94-142; parents and advocacy groups often were able to push LEAs faster in the direction

determined by the law. For example, the director of special education in a large urban LEA with active advocacy groups stated that:

> Most of our policy is predetermined by the need to comply with the law. When we do it and how we do it is an effect of advocacy.

Another administrator in this district added a comment about the unique advantage of advocates:

> Introducing change is a problem itself. The system is designed not to change--sometimes you need clout. A superintendent who tries to change is ousted. That's why advocates are helpful.

Another major factor influencing special education seems to be the quality of the special education leadership in the LEA. Often, leaders who tried to plan systematically for change, rather than just react, espoused "best practices" in special education before PL 94-142. However, even these leaders used the clout of PL 94-142 to accomplish what they had already planned to do, particularly if they were in districts that had large problems and fiscal constraints. For example, the director of special education in one large urban district stated that "PL 94-142 was the lever needed to get things accomplished."

The role of the SEA was also an important influence on special education in the last 4 years. As described throughout this report, the SEAs' increased focus on monitoring made LEAs take corrective action in areas addressed by PL 94-142 in which they were falling behind, such as reevaluations.

Finally, there is no way to overestimate the level of resources available to the LEA as a factor influencing special education. For example, we have seen that one of the most important factors aiding LEAs in responding to PL 94-142's FAPE and LRE mandates has been the increase in resources for special education and related services. With adequate resources, districts could add personnel and thus increase the scope and comprehensiveness of special education programs and services. However, we

have also seen that the fiscal constraints of the last several years have caused a few districts to cut personnel, thus limiting the programs and services available to children.

Interaction of Factors

In sum, many of the major factors causing change in special education over the last 4 years were related directly or indirectly to PL 94-142. Without the law, these other factors often would have been less effective in causing change.

Each LEA has had to respond to a unique combination of factors within its local context. These factors interacted with one another in complex ways depending on each LEA's unique context. For example, a very good administrator might not need the extra clout of a federal law if the LEA were located in a community with well-educated parents, had many resources, had a model state law, etc. Sometimes these factors were at odds with one another; at other times they all acted to push the system in a given direction. For example, we were told in one LEA, "With a good leader, the clout of 94-142, a liberal and well-informed board, and local community financial support, it's a cakewalk. You can't miss." On the other hand, we visited an LEA that had minimal local support, a special education director with a very limited view of the school's responsibility, and very passive parents with low expectations; the implementation of PL 94-142 would be expected to be much more problematic in such a district.

Because of these interactions, it has often been difficult to separate the various factors that motivated specific changes. However, we have been able to ascertain several patterns in the LEAs that SRI visited, in terms of the relative importance of PL 94-142 vis-a-vis the other factors. First, the federal law has had the least amount of effect in LEAs which tended to have many resources, few basic gaps, active advocates, and good leadership. These leaders often had planned (even before the implementation of PL 94-142) to refine programs and services to meet a full service goal.

Even though PL 94-142 gave these LEAs clout to help refine their programs and services, from the point of view of these LEA administrators, much of this change would have happened anyway (with the exception of some of the specific procedural requirements mandated by PL 94-142) because the law capitalized on existing trends in special education and because these districts tended to have many available resources. However, the change almost certainly would have been slower without the law; PL 94-142 helped these districts move faster toward the goals already established. As a director of special education in one such district noted, "We had identified the problems and were acting on them. Without the law, we would have gone the same way, but more slowly." He added that PL 94-142 did have a large impact even in this type of district: "PL 94-142 had an enormous lasting impact on people's psyches [even] in a liberal district. It codified a direction in which we were going."

Districts such as the one described above are few and far between, however. In most districts, PL 94-142 had a larger effect. For example, we have seen several rural sites with little money, leaders without far-reaching vision, and complacent parents, where PL 94-142 (both its money and the clout) had a big impact in terms of filling basic gaps in programs and services. In addition, we have seen other examples of poor urban areas, or cities in states traditionally less responsive to the needs of handicapped children, where the authority of the law also had a big impact on mobilizing LEAs to fill basic gaps.

As described in Section IV, a lack of resources in the last year or two has inhibited progress in implementing an increased scope and comprehensiveness of special education programs and services. Thus, the impact of the law is decreasing as the lack of money takes over, dictating the progress (or retreat) that districts are currently making. However, in this era of diminishing resources, the law assumes more importance. The director of an LEA that has severe financial constraints stated that:

> The law has given us a lever, a club, to hold onto special education programs, especially in the last two years of scarce money...If there were no federal law, more would be wiped out by now.

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Appendix A

CONCEPTUAL FRAMEWORK

Appendix A is taken from pages 9-21 of Local Implementation of PL 94-142: First Year Report of a Longitudinal Study, Marian S. Stearns, David Greene, and Jane L. David, 1980. Our conceptual framework has continued to evolve over the course of this 4-year study. However, most changes are minor and are reflected in the text of the report.

Appendix A

CONCEPTUAL FRAMEWORK

Overview

Public Law 94-142 is a federal mandate to change the way state and local school systems operate in providing services to handicapped children. The primary purpose of our study is to inform SEP and Congress about whether special education at the local level is changing in the way the law intended and, to the extent possible, to explain why or why not. We view local implementation of PL 94-142 as a process of mutual adaptation between the requirements of the law and the realities of local school systems (cf. Berman and McLaughlin, 1978). The requirements of the law dictate changes that local school systems must undergo, but the degree of these changes and the forms they may take are constrained by the organizational and financial structure of the schools and the political and social idiosyncracies of each local community.

The basic orientation and focus of the study are provided by our conceptual framework. In making explicit our point of view, it plays many roles in the actual conduct of the study (see Appendix B). The conceptual framework also allows the reader to judge the extent to which he or she shares our point of view. Its two major components are an analysis of the goals of local implementation and a model of the context in which local implementation occurs. The first component provides the study with a benchmark against which to assess progress toward full implementation. The second component serves to define the domain within which we expect to find most of the useful (i.e., policy-relevant) explanations for why local implementation is proceeding one way rather than another.

Goals of Local Implementation

The first major component of our conceptual framework is an analysis of the goals of local implementation of PL 94-142. It was derived from a careful scrutiny of the pertinent sections of the law, including both legislative language and history and the applicable federal rules and regulations. As the law and regulations are written, the logical and practical relationships among the various requirements and goals are not always easy to discern. Hence, we needed to provide our study with an explicit description of the most important of these relationships.

Overriding Goals and Broad Implications

PL 94-142 includes two overriding goals that pertain to LEAs: the provision of a free appropriate public education (FAPE) to all handicapped children and the protection of the rights of handicapped children and their parents. From the perspective we adopted in this study, FAPE is a broad, overarching concept that subsumes the "procedural safeguards" concerned with placement in the least restrictive environment and with nondiscriminatory evaluation. In this view due process procedures (e.g., for parental notification and informed consent, and for due process hearings to resolve disputes between parents and the schools) serve the specific function of protecting the right of all handicapped children to FAPE.*

We presume that few, if any, LEAs presently operate so as to achieve the goal of providing FAPE to all handicapped children. Implementing the law, therefore, requires LEAs to bring about change in prevailing practices. By comparing the current operations of most local special education systems with the ideal system implicitly described in the law, we derived two fundamental action implications, or implementation goals, that LEAs should strive for:

- Increasing the scope and comprehensiveness of special education services.
- Changing current procedures so they result in individually appropriate services for children.

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* Requirements for placement in the least restrictive environment and for nondiscriminatory evaluation are classified differently in the regulations than in the law itself. In the regulations, the procedures concerned with placement in the least restrictive environment and with nondiscriminatory evaluation are classified, along with due process procedures, under the rubric "Procedural Safeguards" (subpart E). In the law itself, however, the section titled "Procedural Safeguards" (Section 615) covers due process procedures exclusively. In light of this classification difference between the law and the regulations, we felt free to decide for ourselves which one best suited our purposes. We reasoned that the key distinction is between that which is being protected (i.e., the FAPE rights that are being guaranteed by the law) and that which is doing the protecting (i.e., the due process procedures designed to back up the guarantee). Although evaluation procedures and placement procedures logically may be construed as belonging in either category, we opted to include them as integral components of the FAPE goal.

The first of these implementation goals requires LEAs to reach out and serve all children in need of special education services (i.e., to eliminate inappropriate exclusion from the system). It also encompasses an increase in the range and flexibility of services available to eligible children. This has merit in its own right and is based on the presumption that a wide, flexible range of services facilitates movement toward less restrictive placements. In short, LEAs must identify and serve all eligible children.

The second implementation goal requires changing traditional practices in specific and fundamental ways; this amounts to a paradigm shift in how schools decide what services each child receives. Traditionally, special education practices have rested on classification: a child is classified as having one or more handicapping conditions that then determine what services are to be delivered, by whom, and where. The intent of PL 94-142 is to alter this system fundamentally by shifting the focus of special education from categories of disabilities to individual children's needs. The law now requires that a child's unique needs be identified and that services appropriate to these needs be provided. Instead of fitting children to available programs, schools are now required to design an individually appropriate program for each child. The procedures specified to accomplish this goal necessitate basic, structural changes in how educational programming decisions are made. These basic, structural changes must be one of the fundamental implementation goals for LEAs.

The FAPE Schema

After visiting all of our sites during the planning phase of the study, it became apparent that, with rare exceptions, personnel attracted to special education are dedicated to providing an appropriate education for all handicapped children. It was also apparent, however, that individuals working in these 22 diverse LEAs met with greatly varying degrees of success in attaining the ideals of PL 94-142. Although it is always possible for exceptional individuals to achieve their own, different purposes in spite of a system that discourages them, it is far more common for the structure of an organization to shape and direct individuals' actions. Therefore, we decided it was most useful to study the degree to which goals were met in terms of how local special education systems operate, rather than in terms of the

behavior of individuals or the degree of their compliance with specific provisions of the law.*

Figure 1 is a schematic representation of what the law says about how an ideal special education system should operate under full implementation of PL 94-142. The schema omits the due process procedures, not because they are any less important than the FAPE provisions, but simply because, conceptually and graphically, it is unwieldy to depict both on the same diagram. Parents who have a complaint may invoke due process procedures with respect to virtually any matter shown in the FAPE schema. Thus the protection afforded by the due process requirements is intended to permeate the entire system rather than be localized anywhere that might be usefully depicted in the schema.

The FAPE schema explicitly represents the relationships among the mechanisms, values, and goals in PL 94-142 that characterize an ideal local special education system. By this we mean a school system that is set up to achieve the goal of providing FAPE to all handicapped children in its jurisdiction, and in which due process procedures are functioning effectively. Thus, the FAPE schema serves our study as a working definition of the intent of the law. The remainder of this section describes the elements of the FAPE schema in some detail, thereby introducing the reader to most of the specific requirements of the law with which our study was concerned.

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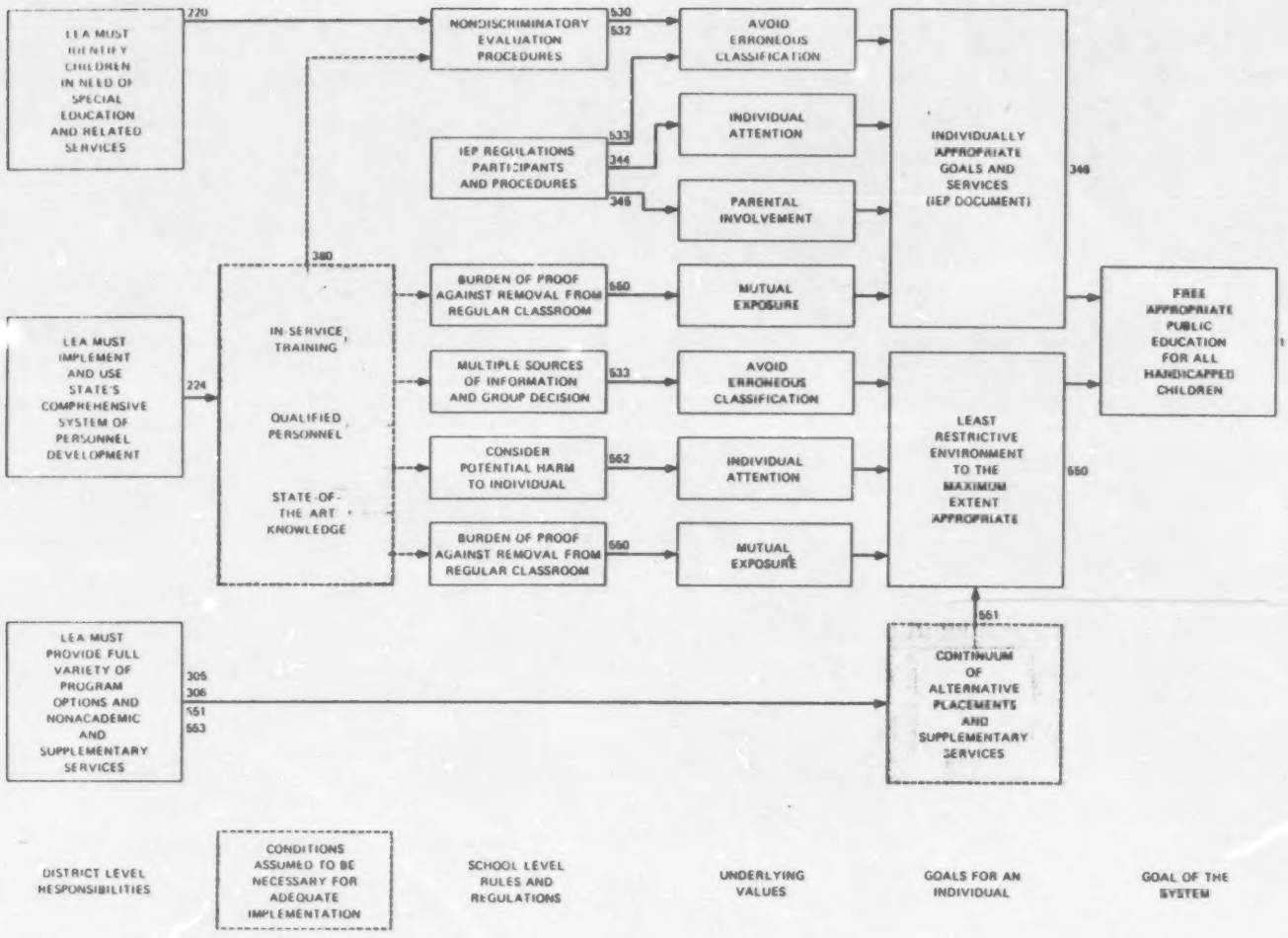
* The related decision, to conceptualize the spirit of the law in terms of a special education system operating in a manner compatible with the law's intent, effectively eliminated our need to address a host of questions dealing with individual motivation and blame. Thus, we were able to focus our attention where it was most likely to lead to policy-relevant observations: on incentives and disincentives, coping strategies, de facto priorities, and the practical difficulties of achieving the law's intent in organizations that were set up to operate differently.



NOTE Numbers Near Boxes Refer to Regulations 121a 1 through 121a 754

FIGURE 1 STRUCTURE OF MECHANISMS, VALUES, AND GOALS IMPLICIT IN THE FEDERAL RULES AND REGULATIONS DESIGNED TO ACHIEVE THE FREE APPROPRIATE PUBLIC EDUCATION GOAL OF PL 94-142 AT THE LOCAL LEVEL

The ultimate goal of the system depicted in Figure 1 is to provide a free appropriate public education for all handicapped children. This requires that two complementary decisions be made about each handicapped child: What educational goals and services are individually appropriate for the particular child? and What is the least restrictive environment in which the child can be provided with the services appropriate to his/her needs?

Central to these decisions, and hence shown directly to their left in this schema, is a set of four basic values that can be inferred from a close reading of the legislative history of PL 94-142. Most crucial is the need for individual attention. Complementing this is the imperative of avoiding erroneous classification. Together, these two values constitute a fundamental shift in emphasis away from a system in which the assignment of a child to a category was the most significant event in the child's special education career. The third basic value is that of parental involvement. The final value derives from an awareness that both handicapped and nonhandicapped children benefit from the mutual exposure that "mainstreaming" provides.

Decisions about what is "appropriate" should result from treating the child individually, involving the child's parents, avoiding erroneous classification, and considering the benefits of mutual exposure. Decisions about what environment is least restrictive should result from a balancing act in which the "mainstreaming" goal of the law is reconciled with the child's best interest.

The law also includes specific requirements that should encourage the consideration of these basic values in the decision-making process. These requirements appear in the federal rules and regulations which are shown to the left of the boxes labeled "Underlying Values." In determining which services are most appropriate for the child, the key regulations concern IEP procedures, testing and evaluation procedures, and the need to justify removing a child from the regular classroom. To determine the least restrictive setting appropriate for the child, the salient regulations are those concerning multiple sources of information and multiple participants in decisionmaking, consideration of potential harm to the child and, again, the justification for removing a child from the regular class setting.

These requirements, and the values they promote, are considerations primarily dealt with by people at the school level (teachers, evaluators, principals) who work directly with the handicapped child. The role of the LEA administration in the law's implementation hierarchy is to provide the conditions necessary for school level personnel to carry out their functions as intended. These conditions are presented in the shaded boxes.

To choose a placement that is the least restrictive environment appropriate for the child, decisionmakers must have some range of placements available from which to select. Similarly,

to permit the decisionmaking and service delivery mechanisms to operate as intended, the LEA must provide qualified personnel, in-service training, and the dissemination of "state-of-the-art" knowledge. Thus, the LEA is required to identify all children in need of special education and related services so that their individual needs can be determined. The LEA is also required to implement and use the state's comprehensive system of personnel development. Finally, the LEA must provide a full variety of program options and nonacademic and supplemental services in order to ensure that there is a continuum of alternative placements and supplementary services.

The main advantage of the FAPE schema is that it shows the relationships among the literal and implied requirements of the law and its regulations. It is not intended to describe what actually happens in a school or district; instead, it describes the considerations that ought to influence the way school systems refer, evaluate, place and provide services for handicapped children. If current practices in LEAs do not reflect these considerations, then the law intends that such practices change.

Context for Local Implementation

The second major component of our conceptual framework is a model of the context in which local implementation of PL 94-142 occurs. Because they are relevant to studying the implementation goals described in the preceding section, certain features and characteristics of public service bureaucracies in general and local special education systems in particular are described in this model. The law is designed to bring about some rather basic changes in how these systems operate; therefore, we have paid particular attention to the characteristics most likely to pose barriers to these changes.

Special Education Systems

Most local special education systems share three organizational characteristics that are likely to play a significant role in the implementation process: specialization of functions, division along the lines of different disabilities, and separation between the special and regular education systems. Although the structure of special education systems does differ from place to place, particularly as a function of the size of the administrative unit, these three characteristics are remarkably uniform.

Every special education system performs the same basic functions in the same basic sequence: students are identified and referred, evaluated, placed, and provided with services. In all but the smallest districts, different personnel are involved at different stages in this series of functions. Thus, to implement change (e.g., breaking down the historic tendency to provide services solely on the basis of a child's classification), the

effort must be coordinated so that each person in the process is working toward that goal. In a small district, this effort may amount to little more than the psychologist who is "in charge" of special education informally communicating a new concept to the appropriate people. In larger LEAs, however, assessment functions and service delivery functions are often performed by personnel reporting to entirely separate organizational entities, neither of which has a direct line relationship to other school level personnel. Specialization of function is at its greatest here: before a new concept can have significant impact at the school level, coordination must have begun at the highest level of the administrative ladder and been passed down step by step.

The traditional division along the lines of different disabilities is an even more fundamental obstacle for PL 94-142 implementation. For historical reasons, the typical special education system of today is literally designed to channel handicapped children into one of a fixed number of programs; the larger the system, the larger the organizational structure of each separate program. In its most extreme form, each organizational unit charged with the delivery of services for a particular disability may even have its own referral form and its own IEP format. Within such a system, the best efforts of an EMR (educable mentally retarded) coordinator to teach regular teachers to use a referral form may actually work at cross purposes to the efforts of an SLD (specific learning disabilities) coordinator doing the same job. Clearly, it is difficult to implement goals that emphasize the individual in a system so firmly rooted in classification by type of disability.

The organizational boundary between regular and special education also has deep historical roots. Although districts vary among themselves, special education has always been "different," either subordinate to the regular education system or autonomous, but with a much more limited budget or line authority. This separation typically exacerbates the stigma often associated with handicapped children (and those who work with them) and limits the ability of special education administrators to effect changes in policy. Given the emphasis in PL 94-142 on "mainstreaming" and other desiderata related to coordination between regular and special education, this organizational boundary merits attention.

Public Service Bureaucracies

Local educational agencies share several features with other public service bureaucracies in which change has been studied. Police departments, welfare agencies, and school systems, among others, share certain characteristics that affect their capacity to change. One such feature is their public service orientation. Unlike organizations motivated primarily to maximize profits, public service bureaucracies are oriented toward satisfying their clients' needs for services; and client demand always expands to absorb all the services the system can deliver. A corollary is that problems literally never go away. Thus, a teacher could never meet all the individual needs of all her or his students, and at the same time meet the expectations of colleagues and superiors. Similarly, a district office can never meet all the legitimate needs of all the schools it serves and the agencies to which it is responsible. It follows that public service bureaucracies are chronically short of resources and are forced to compete for a limited share of them. Hence, their most basic need, adequate and reliable financial support, is dependent on politics and usually beyond their control.

This combination, unlimited demand and limited resources, means that individuals in public service bureaucracies inevitably develop coping strategies in order to make the necessary trade-offs. These strategies are not necessarily devised or implemented consciously, but they are inevitable. Examples abound: establishing priorities among programs to support or clients to be served, modifying goals, redefining or limiting clientele to be served, establishing routines to handle more individuals in less time, rationing services and, in general, exercising considerable discretion in day-to-day practice.

Finally, although mission-oriented, public service bureaucracies, as complex organizations, are also structured to maintain stability. Consisting of individuals whose role relationships are well defined, they do not change readily or by fiat. Hence, introducing fundamental change into a system like the public schools is bound to encounter some resistance and predictable problems.

The "Bottom-Up" Perspective

On the basis of our experience, the Rand study of educational change by Berman and McLaughlin (1978), and the hindsight afforded us by Weatherley's (1979) detailed study of the implementation of Chapter 766 (the special education law) in Massachusetts, we know that local contextual factors play a major role in shaping the specific nature of the inevitable trade-offs and coping strategies of both individuals and organizations. Weatherley provides many illustrations, such as the predictable tension between identifying and serving a larger number of children and providing more individualized attention for those

already in the system. A school principal, for example, must decide whether to spend numerous hours arranging an in-service training program to help all his regular teachers improve service to handicapped children in their classes or to spend those hours helping a teacher solve the problem of one child's needs for more appropriate services.

Along with the Weatherley and Lipsky (1977) "street level bureaucrat" model, we take the perspective that policy is being made (i.e., "implemented") by the behavior of the individual most closely in contact with the client. From this point of view, the higher federal and state administrative levels function as constraints on the range of options available to these local "policymakers." These constraints can be either facilitators or inhibitors when they are compared with some idealized standard of performance. For example, a state requirement that a psychologist use a particular battery of tests constitutes a constraint within which the psychologist has to operate in conducting an evaluation. If the requirement is consistent with the goals of PL 94-142, it facilitates progress toward implementation; if not, the requirement inhibits it. What this means is that individuals in public service bureaucracies are always being "squeezed" between constraints from above and demands from below. At any point on the administrative ladder there is always some level of the organization that is under pressure.

Our study of local implementation focuses on two levels of local special education systems: the administrative (district) level and the service delivery (school) level. In later sections of this report, we often use the term district to refer to various administrative level staffs; similarly, we refer to all service delivery personnel (e.g., psychological evaluator, resource teacher, principal) as school level. These two levels, with their respective contexts, are depicted in Figure 2.

The top half of the figure represents the administrative level. Assuming the administrative unit is a district office, the SEA at the top sends down regulations and money, monitors the district office, and provides technical assistance.* Immediately below are the schools, needing and demanding as much help from the district office as they can get. As an organization, the district office has certain attributes ("within-office factors") that may facilitate or inhibit its capacity to get things done. An unusually competent administrator can increase the capacity of this office to deal with its problems. If the administrator is the only district-wide special education person--as is the case in many small districts--then his or her capacity <u>is</u> the district office capability. In any case, we expect the office to be

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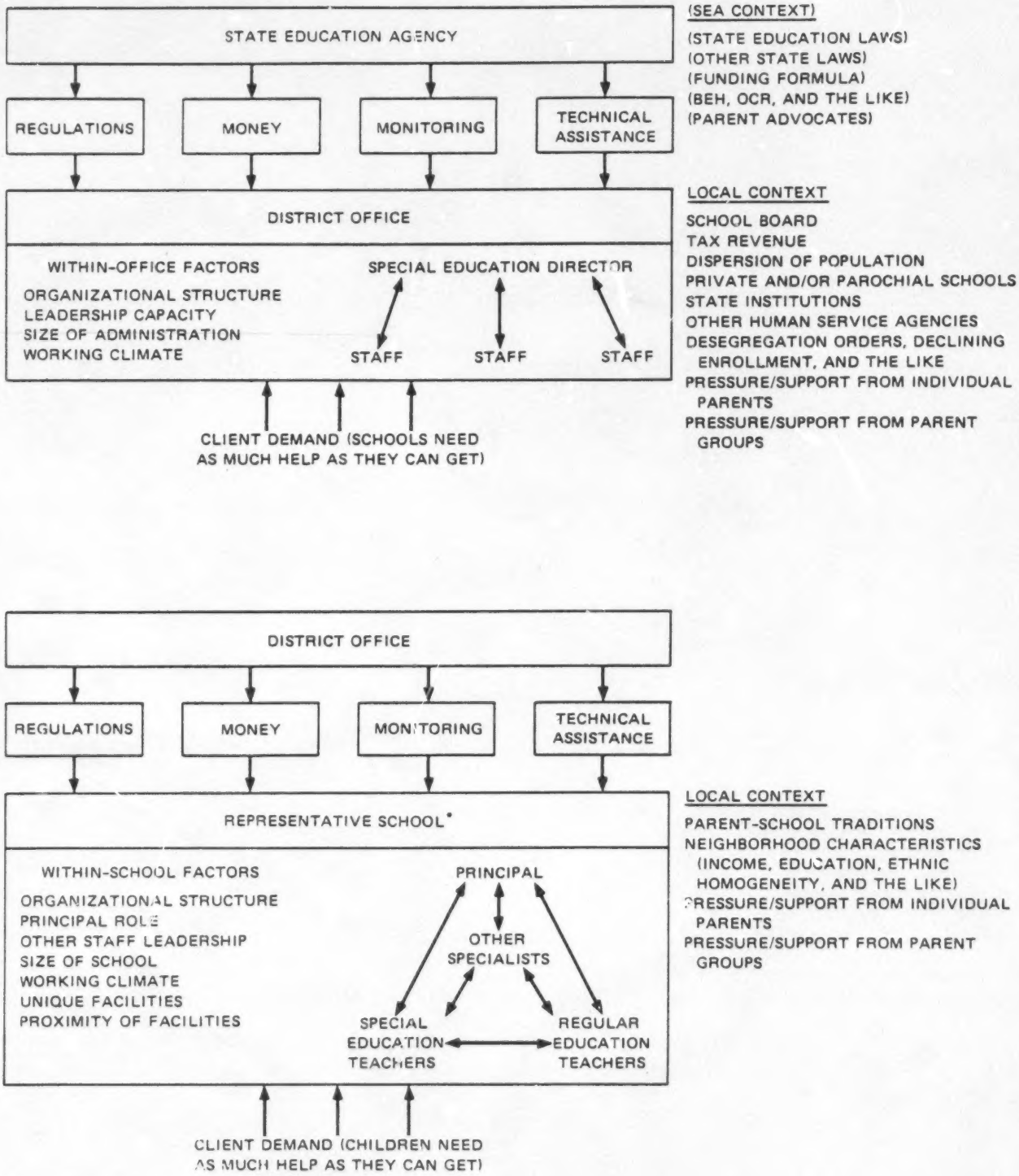
* The SEA itself is affected by its own context, of course, but we take this level into account in our study only to the extent that it has a direct effect at the LEA level.



*Districts vary in heterogeneity among schools.

FIGURE 2 MODEL OF IMPLEMENTATION CONTEXT

figuratively "bursting its seams" because of pressures from top and bottom. According to our view of discretionary strategies, the specific, concrete, day-to-day details of the local context will determine where the figurative "bulges" occur. Thus, for example, a district with little or no organized parent pressure will find it relatively easy to place a low priority on the parental involvement requirements of the law. On the other hand, a district with organized and vocal parent pressure cannot long avoid responding to the parent involvement requirements, despite the heavy commitment in time and personnel that this entails.

The bottom half of Figure 2 depicts the service delivery (school) level. At the top is the district office, representing both the helpful and restrictive constraints that act on the local school. Below are the children to be served. The quality of school personnel and leadership (and other "within-school factors") varies, as it does at the district level. Given the view that schools operate at or near their capacity, when they are caught up in the demands-resources squeeze, their priorities depend a great deal on the specific, concrete, day-to-day details of the immediate context. For example, when only one opening for a special program exists, one would expect that those with the loudest demands will likely be given the most attention. Of course, these demands may come from frustrated teachers as well as persistent parents. What our model suggests is that the relative volume of demands is related to such ("local context") factors as the economic and educational level of parents and the traditional parent-school relations in the neighborhood where the school is located.

In summary, our model of the implementation context adopts a "bottom up" perspective on implementation. To study the progress of implementation, we focus our attention on the structural features of local special education systems and on a few basic "facts of life" common to all public service bureaucracies. In doing so, we share the point of view of the individuals who deal most directly with handicapped children and their parents. These "street level bureaucrats," be they teachers or school-level administrators, are the individuals whose responses to the requirements of PL 94-142 determine whether or not the intent of the law is met. Their responses, in turn, reflect the circumstances of their daily lives, of which the federal law is only one factor. Thus, to understand local implementation, we must understand how the requirements of the law do or do not mesh with preexisting local practice.

The "bottom up" perspective relegates PL 94-142 to just one factor among many influencing the practice of special education. While this is an accurate view because the progress of implementation is, in fact, multiply determined, it minimizes our ability to attribute any particular fact or event to the law, per se. Instead of attempting to isolate the effect of the law by itself, we study the effect of the law in combination with preexisting state and local contextual factors. Because any change that

policymakers might institute in the law or regulations would also have to operate under this same combination of factors, this approach seems suited to provide policymakers with the most appropriate point of view.

This conceptual framework has continued to evolve over the first year of the study. As elaborated in the following chapter, our basic method of approach is iterative. For the conceptual framework, this approach means continued revision and refinement, such that, at any given point in our study, the current version incorporates and represents what we have learned about how best to think about local implementation of PL 94-142. In this sense, the conceptual framework is in itself an important product of our study.

Appendix B

METHOD OF APPROACH

Appendix B is taken from pages 23-50 of Local Implementation of PL 94-142: First Year Report of a Longitudinal Study, Marian S. Stearns, David Greene, and Jane L. David, 1980. In general, our method of approach has remained constant over the course of the longitudinal study. However, there have been two specific changes since the first year of data collection:

- We are now collecting data in 16, rather than 22, LEAs; in addition, we collect data only once during each school year. However, the sites visited still represent a wide variation in state and local characteristices.

- Our method of cross-site analysis has evolved since the first year of the study. As described on page B-26, during the first year of the study, it was difficult to retrieve information for cross-site analysis directly from the debriefings; we therefore generated "propositions," or potential findings, to which site visitors reacted. However, in the later years of the study, we modified our format for the debriefings, so that the debriefings could feed directly into the cross-site analyses.

Appendix B

METHOD OF APPROACH

Overview

In conceiving this study, SEP recognized the importance of delving into the underlying dynamics of local implementation. To best use its resources for this purpose, SEP's request for a longitudinal study specified a multiple case study design.

This design has obvious advantages for leading to policy-relevant insights. The open-ended, intensive style of case study research is ideally suited to investigating complex processes and discovering unexpected relationships that could elude a more structured, survey-type approach. Moreover, the main weakness of a case study--that it provides depth at the expense of breadth--is obviated when the results of many similar case studies can be compared and contrasted with each other. Nevertheless, all designs have their pitfalls; hence, to maximize the validity and generalizability of our findings, we infused our methods with precautions against the major pitfalls we could anticipate.

We knew that we could generalize relationships from our sample to a larger population only if the sample included a wide range of variation on important explanatory factors.* Thus, in selecting our sample, we designed procedures to ensure that our 22 sites varied considerably on the factors then deemed most likely to explain differences in local implementation. After three visits to each site, our staff were able to develop a more informed list of factors on which it was essential there be variation in order to protect against invalid inferences. We were then able to confirm that our sample selection procedures had indeed accomplished this purpose.

In conducting the individual case studies, we designed procedures to ensure that we obtained multiple perspectives, asked relevant questions, and avoided premature closure. These procedures minimized the danger that our site-by-site findings would be trivial or unnecessarily contaminated by respondent or interviewer bias. Also, in performing cross-site analyses, we adopted an inductive logic of disconfirming or qualifying propositions rather than a deductive logic of testing hypotheses. This approach, among its other virtues, enabled us to avoid the loss of interesting and important findings that appeared in only a few sites or in different forms in different sites.

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* We discuss the subject of generalizability at greater length on page B-8 ("Variation on Important Factors").

Finally, our methods included the validating step of peer and practitioner review of our findings. By circulating our draft report among a score of critics with a wide variety of perspectives, we assured ourselves that our inbred limitations had not produced a phantom picture of reality. Ultimately, of course, any longitudinal study also benefits from the opportunity to make improvements over time on the basis of continuing feedback. The rest of this Overview section introduces two orienting concepts that illustrate how this works in our study.

Cycles of Data Collection and Analysis

The iterative, cyclical nature of our study is illustrated in Figure 3. Each year of the longitudinal study includes two cycles of data collection and analysis. Each cycle begins with the current conceptual framework, which represents our current understanding of how best to think about local implementation of PL 94-142. In the fall of 1978 in particular we had the benefit, not only of our prior knowledge and experience, but also of what we had learned from site visits conducted during the planning phase of this study. As described in more detail in subsequent sections, the conceptual framework provides the starting point for generating a working list of topics to pursue on site (the "debriefing format") and criteria for site visitors to use in selecting respondents with whom to schedule interviews. It is also the source of more general concepts that provide some of the content of site visitor training. After this training, the cycle continues with the site visits themselves, individual site analyses, and cross-site analyses. As illustrated in Figure 3, decisions made during earlier stages in the cycle may be modified as dictated by experience during later stages. Finally, the results of data analyses feedback into the conceptual framework, where the next cycle will begin.

There are two different ways in which our knowledge grows with each cycle of the study. First, we describe changes in the status of special education in our sites that take place over time on specific topics of interest (e.g., uses of IEPs or the range of currently available services). To the extent that the same topics remain of interest over time, these descriptions of changes in status are analogous to traditional longitudinal data.

Second, with each cycle of the study we increase our ability to judge what feature of each topic is most important to pursue

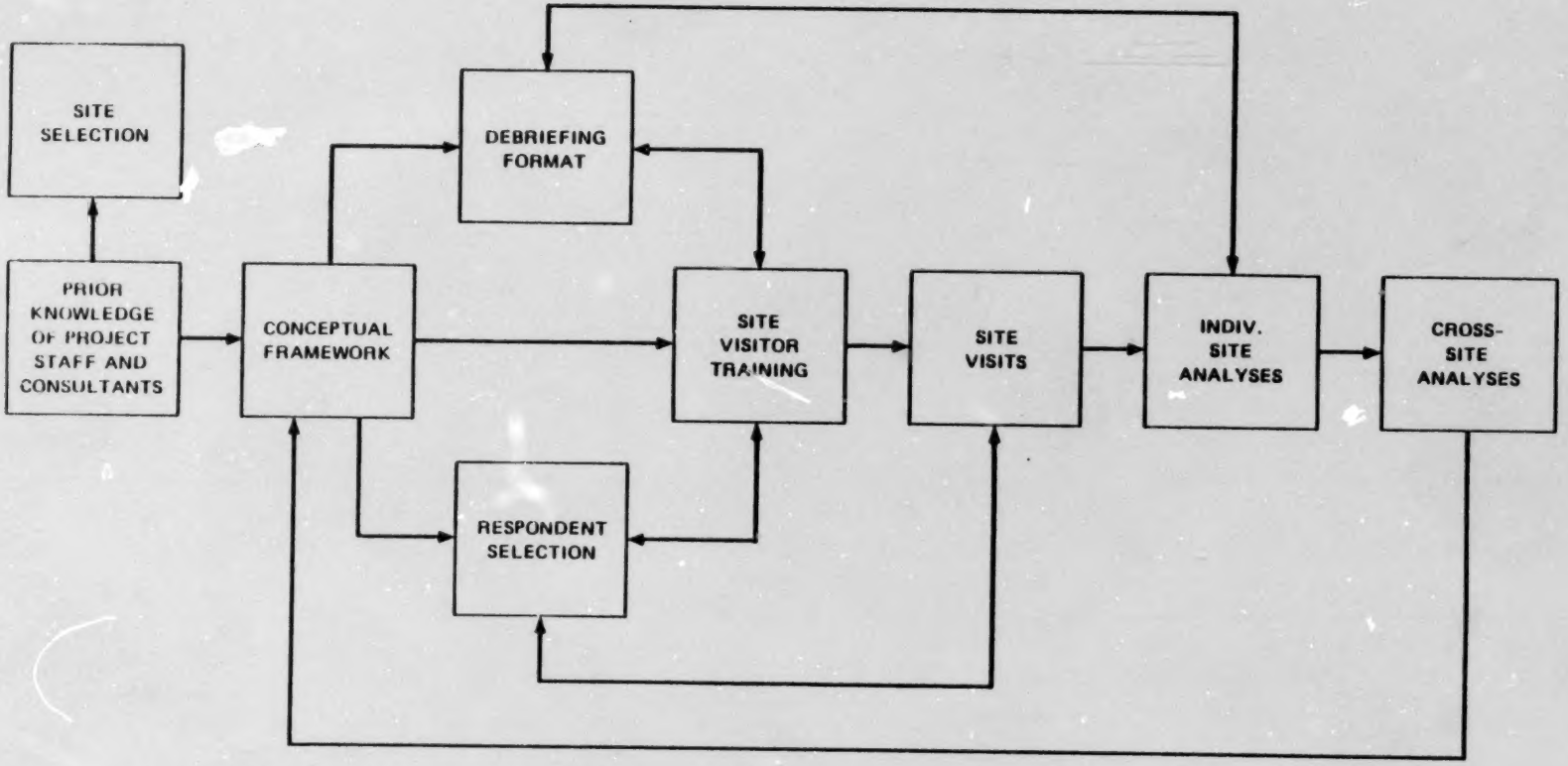

FIGURE 3 OVERVIEW OF METHOD OF APPROACH

in greater depth. At the level of the study as a whole, this increase in knowledge leads us to refine the conceptual framework and to shift our approach to particular topics. Thus, for example, our first year of data collection revealed the importance of "prescreening" (informal prioritizing) in the referral process, but we were not prepared to explore the dynamics of prescreening to any great depth because we had not anticipated its importance. If warranted by our current priorities, we will be able to approach this topic with more sophistication the second time around. At the level of an individual site, this increase in understanding over time is a unique advantage of the case study approach.

Role of the Site Visitor

Another important orienting concept is that of the site visitor as the data collection instrument, rather than a data collector who makes use of a data collection instrument. In our study, it is in the person of the site visitor that the techniques for conducting case studies and for achieving comparability across cases merge. All site visitors are trained to understand the conceptual framework, the particular topics to be pursued, some general techniques for maximizing validity, and specific criteria to guide respondent selection (Figure 3). The essence of effective data collection, however, is the choice of particular respondents and the specific ways in which each topic is pursued at individual sites. These decisions can be best made by a site visitor who is thoroughly familiar with the characteristics of a particular LEA. Hence, it is the site visitor who combines knowledge of a particular LEA with the topics derived from the conceptual framework. The perspective gained from this combination forms the basis for a site visitor's particular way of obtaining information, information which is not only unique to the site but which simultaneously addresses the common topics of our study as well. (This use of common, systematic procedures, of course, greatly facilitates cross-site analyses on the information thus obtained.)

The site visitor must also constantly adapt to the particular situation while collecting data in the field. Acting essentially as a data analyst in real time, the site visitor is constantly generating explanations and testing them against new information. Each new response leads the site visitor to strengthen, reject, or revise the hypothesized relationship. Thus, each site visit itself is characterized by cycles of discovery and verification, a replication in miniature of the iterative character of the study as a whole. The cumulative product of repeated visits to the same site is a site visitor whose combined knowledge of the concerns of our study and the details of the individual site provides a remarkably powerful tool for data analysis, both within and across sites.

The initial selection of sites is the only stage of the study that does not reflect its iterative nature, because the sample (or a portion of it) is kept constant for longitudinal comparisons (Figure 3). The following section describes the method by which we selected our sample and provides evidence of the variation within the sample on important explanatory factors. Subsequent sections describe our data collection and analysis procedures.

Sample Selection

The goal of sample selection was to choose a number of sites small enough to study intensively and yet varied enough to support generalizations to a larger population. To accomplish the former, we limited the number of sites to 22. To accomplish the latter, we selected factors that we believed would be most likely to explain differences in local responses to PL 94-142 and that could be ascertained, at least grossly, in advance. We then devised procedures that would ensure maximum variation on these factors among the LEAs in our sample.

Selecting States

The purpose of selecting states was to maximize the likelihood of obtaining relevant variations among the LEAs in the resulting sample. To ensure this variation, we began by selecting states that represented the continuum on the match between existing state special education laws and PL 94-142. We presumed that the extent to which states had enacted requirements similar to PL 94-142 before its passage would strongly influence the responses of their LEAs to the new requirements. Hence, we used state level measures of policies similar to PL 94-142 as a proxy for the extent to which LEAs in the state would have had a head start in implementing the new law.

To measure the match between state laws and policies and PL 94-142, we first used information from the review of state laws and regulations conducted by the National Association of State Directors of Special Education (NASDSE). In keeping with the philosophy of our study, we also interviewed persons with firsthand knowledge of state practices. These included NASDSE staff and SEP state plan officers. This enabled us to sort states into three categories--low, middle, and high--according to how closely their state policies matched the major provisions of PL 94-142 (individualized education programs, parental involvement, a variety of placement settings, and allowances for least restrictive placements).

To select the states in which LEAs would be chosen, we held a conference in Washington, D.C., attended by SRI staff, SEP officials, and NASDSE staff. During the meeting we sought comments on the results of these classifications. At the suggestion of

the participants, two other state level factors were added to our selection criteria: state funding formulas for special education and the state system of organization for special education. Based on these criteria and the comments of the conference participants, we chose nine states that represented substantial variation on the factors: California, Florida, Illinois, Mississippi, Oklahoma, Pennsylvania, Rhode Island, Tennessee, and Washington.

Selecting LEAs

LEAs in these states were selected so as to maximize variation on local factors that we expected would influence responses to PL 94-142. We presumed that the availability and accessibility of resources would strongly affect local special education practices. We defined availability of resources as the amount of local funding, facilities, qualified staff, administrative leadership, and community involvement. We defined accessibility of resources in terms of geographic size and population dispersal. We also wanted to ensure variety on other potentially significant influences such as the presence of residential institutions, collaborative relationships with other districts, state-supported special schools, and separate buildings for special education.

To obtain information on these factors and nominations for LEAs to be included for study, we spoke with the state directors of special education and other state level personnel in all nine states. During these conversations we described both the purposes of the study and our definitions of the factors on which we wanted variation. The former was necessary in order to communicate that the success of the study rested on our ability to see problems as well as solutions; hence, we pointed out that the study would fail if only exemplary LEAs were nominated. Because the factors were essentially clusters of variables and not individually measurable, we also spent considerable time explaining what we meant by resources and the type of variation we were seeking. The nominations we received reflected our criteria and covered a range of districts from each of the nine states. From these recommendations, we chose two or three LEAs from each state, primarily to ensure variation across the entire group of them and on the basis of logistical concerns. This resulted in a sample of 22 LEAs (Figure 4).

Variation on Important Factors

Before looking at the evidence that shows we achieved requisite variation in our sample, we should consider how this evidence is related to the generalizability of our findings. We are particularly concerned about the generalizability of the underlying reasons or explanations for local responses to PL 94-142 that we infer from the data in our sample. To be useful to policymakers, these explanations must be generalizable to a larger

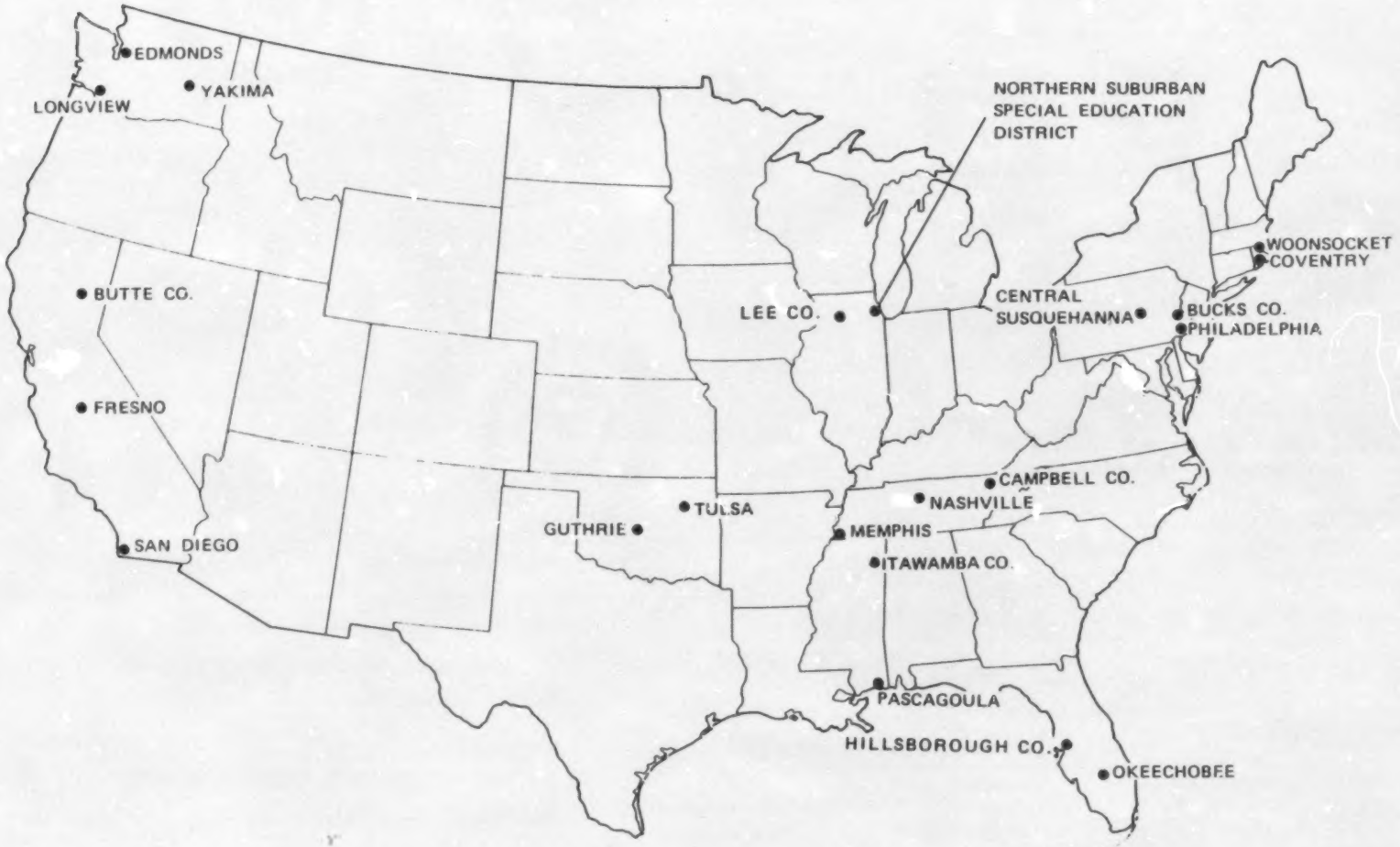

FIGURE 4 FIELD SITES FOR THE LONGITUDINAL IMPLEMENTATION STUDY OF PL 94-142.

population than the 22 LEAs we visited. Because the requirements for generalizability are an extension of the requirements for validity, we begin with a discussion of the latter.

A reason or explanation is valid only to the extent that (1) it is plausible in its own right and (2) we believe that all relevant alternatives have been adequately considered and rejected.* Thus, one cannot prove that an explanation is valid; one can only persuade by argument or by appeal to another's experience that both these criteria have been met. At a minimum, such persuasion requires that the explanation be derived from a sample containing the factors generally believed to be likely explanatory factors. To make a case for validity, one should maximize the variation on as many of these factors as possible. This is because the more a factor varies within a sample, the more reliably its relative importance can be judged. To be even more persuasive, it should be possible to argue that no reasonable candidate explanatory factor has been excluded from the sample.

The criteria for valid inference call attention to the relative importance and relative exhaustiveness of the explanatory factors included in the sample, not merely how much these factors vary. Including all the relevant explanatory factors is necessary to allow the possibility of valid inference; the higher the variation on these factors, the higher the likelihood that valid inference will be achieved in practice.**

An explanation is generalizable from a sample to a larger population only to the extent that (1) it meets the criteria for validity within the sample and (2) we believe that the explanation would appear equally valid if it were tested, by the same criteria, against the data in any other sample comparably drawn

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* This is the crux of all inductive inference. Researchers vary in their abilities to think of relevant alternative explanations, to collect and use data skillfully to test them, and to persuade their audiences that they have done an adequate job. Similarly, the multiple audiences for and stakeholders in research efforts vary in both the sophistication and the neutrality with which they make judgments about the adequacy of these efforts. Hence, reasonable people sometimes disagree about whether a particular research finding meets the criteria for a valid explanation.

** For purposes of this discussion, we assume that the validity of inductive inference is not limited by inadequacies in the analysis of the data provided by the sample. (Our procedures for data analysis are described in a separate section later in this appendix.)

from the larger population.* Thus, the specific criterion for generalizability from a sample is the belief that all the important explanatory factors in the larger population are adequately represented in the sample. Again, the more variation there is on these factors, the more confidence we have that they adequately represent the larger population.

Assessing the adequacy of our sampling choices was a major goal of the preliminary site visits during the Spring 1978 planning phase of our study. Although the site selection factors themselves are not directly measurable (see "Selecting LEAs," above), interviews and documents collected on site provided numerous facts and figures about resource availability and accessibility. State laws and regulations also provided relevant information to confirm the expert advice we had accepted in the process of selecting states. When we used this kind of information to assess the variability in our sample, we were satisfied that it met any reasonable expectations.

After the Spring 1979 site visits, we were in a position to see whether differences in implementation were associated with differences in the kinds of factors we had used to select our sites. With a full year's formal data collection behind us, the staff held a series of meetings to reach some consensus on the set of factors to include in a "site factor matrix." The main criterion for including a factor in the matrix was the same as it had been for choosing the factors that provided the basis for sample selection: the belief that it exercises a significant influence on local PL 94-142 implementation. We also limited the set to the kinds of factors that could be stated and defined so as to apply, as least in principle, to all 22 LEAs.** The main difference was that this time our judgments were based on what we had each learned from interviewing respondents with multiple perspectives in several LEAs.

Tables 1 and 2 present these state and local level factors and their definitions. After a year's experience in the field, these are the 11 explanatory factors that we judged collectively to be most important in accounting for differences among LEAs in

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* In the case of statistical inference, this belief is justified within known limits to the extent that certain assumptions about the population are true and certain procedures for sample selection are followed.

** At individual sites other factors (e.g., local politics) were often, if not always, equally or even more important influences on PL 94-142 implementation. Moreover, the chosen factors so often act in combination with each other that their individual effect at an individual site may be essentially impossible to determine.

TABLE 1

STATE LEVEL FACTORS AFFECTING LOCAL PL 94-142 IMPLEMENTATION

FACTORS AND HOW THEY WERE DEFINED	DISTRIBUTION OF STATES IN OUR SAMPLE		
	+	Neither	-
TRADITION: State special education law as of 1977-1978; plus if progressive, facilitates; minus if regressive, inhibits.	6	2	1
FINANCIAL SUPPORT: As perceived by locals during 1978-1979; plus if abundant, praised; minus if meager, acute problem.	2	6	1
ADMINISTRATIVE LEADERSHIP: As perceived by locals; plus if helpful; minus if detrimental.	2	2	5
MONITORING: As perceived by locals; plus if helpful; minus if detrimental.	1	7	1
ELIGIBILITY CRITERIA: With regard to individualization of services; plus if reasonably flexible; minus if unreasonably rigid.	1	7	1

TABLE 2

LOCAL LEVEL FACTORS AFFECTING LOCAL PL 94-142 IMPLEMENTATION

FACTORS AND HOW THEY WERE DEFINED	DISTRIBUTION OF LEAS IN OUR SAMPLE		
	+	Neither	-
TRADITION: Relative to general education, as of 1977-78; plus if good support in the past; minus if poor support in the past (even if getting better now).	13	5	4
RESOURCES: Relative wealth and political clout within the state; plus if facilitates implementation relative to other LEAs; minus if inhibits implementation relative to other LEAs.	7	8	7
ADMINISTRATIVE LEADERSHIP: Plus if facilitates relative to other LEAs; minus if inhibits relative to other LEAs within the state.	13	7	2
SIZE OF ADMINISTRATION: Of special education; plus if small or simple, minus if large or complex enough to require attention in its own right.	9	5	8
DISPERSION/COMMUNITY STRUCTURE: Plus if urban, industrialized, densely populated, many low-incidence handicapping conditions; minus if rural, not industrialized, sparsely populated, few low-incidence handicapping conditions.	6*	9**	7
PARENT PRESSURE: Plus if heavy pressure for services, high expectations relative to resources, parents are organized; minus if passivity, need to reach out, expectations are met by present services.	3	8	11

*One also high dispersion.
**Includes three suburbs and one small town.

their implementation of PL 94-142. These factors are quite similar to, albeit more proximal and differentiated than, the factors on which our sites were originally selected. We invite our readers to compare this set of factors with their own experiences.

Tables 1 and 2 also provide the opportunity to look at the variation in our sample on these factors. A few comments may be helpful in interpreting the entries in the tables. The "neither" column was used for two different purposes: to indicate an "in between" point on the scale and to indicate that the scale could not be meaningfully applied to a given state or LEA. Because three of the five state-level criteria were defined from the LEA perspective, it was common for a state to be judged "neither" when different LEAs saw the same SEA from conflicting perspectives. This was particularly the case for monitoring, which should be no surprise to our readers. It also appears that our sample overrepresents states and LEAs that had been traditionally more responsive to the needs of handicapped children, or that we came to view more of our sites in these terms after we had visited them. Notwithstanding this tendency in the tables, the data reinforce our conviction that the sample meets the "bottom line" criterion for generalizability of explanations: no cell is empty.

Because the data reflect judgments that our respondents made in confidence, we do not disclose which states and LEAs belong in particular categories. Unfortunately, this constraint results in tables that present a very conservative picture of the variation in our sample. To convey more accurately the extent to which our 22 LEAs represent a variety of combinations of explanatory factors, we present the following capsule descriptions of each site's characteristics.

California

- Butte County is a consortium of 15 school districts in a rural mountain area in northern California. The consortium serves 22,100 students of whom 1,600 are in special education. The consortium was formed to prepare to meet the full educational opportunity/free appropriate public education requirements of PL 94-142 and the California Master Plan for Special Education. Chico State University lies within the county and trains special education personnel.
- Fresno Unified School District is the sixth largest district in California, serving approximately 3,332 exceptional students. Two colleges within the county provide special education teacher preparation. The economy is largely dependent on agribusiness, with a large minority population. Although ranking low on income, the district ranks high on expenditures for instruction. A desegregation plan and the California

Master Plan for Special Education are being implemented simultaneously with PL 94-142.

- San Diego Unified School District is the 11th largest district in the United States, in a city with a large senior citizen population, a large naval base, and two large universities. The special education department is made up of a complex administrative structure that encompasses 5 divisions and 18 different subdepartments. The school district is implementing a court-ordered desegregation plan and has been accepted into the California Master Plan, while in addition adjusting to cutbacks from the passage of the Jarvis-Gann property tax reduction initiative.

Florida

- Hillsborough County's public schools are consolidated into a single school district which is the 22nd largest in the United States, serving approximately 11,500 handicapped students. Tampa, the county seat, is the regional financial, service, and distribution center for Florida's west coast. A large minority population is present in the county, and there are two universities that provide trained special education personnel to the schools. LEAs in Florida exhibit a great deal of independence as do principals within LEAs through the adoption of a school-based management system.

- Okeechobee is a poor, rural county in southern Florida whose main industry is agriculture. There is a large Spanish-speaking, Indian, and migratory population within the county. Like all LEAs within Florida, the Okeechobee School District is a county system and serves a highly dispersed population of 4,300 students of whom slightly over 10% are in special education. Because of its rural location, access to and attraction of resources has been limited.

Illinois

- Lee County Joint Agreement is a special education cooperative located in rural northcentral Illinois that was formed in 1967 when it was mandated that Illinois schools provide special education for all children, ages 3-21, by 1969. The joint agreement includes all of Lee County and two or three districts from surrounding counties, and serves 17% of the school-aged population in special education. One of the largest employers is the residential state mental health facility located in Dixon with an estimated 400 school-aged children to be served.

- Northern Suburban Special Education District (NSSED) is a joint agreement of 23 member school districts on Lake Michigan to the north of Chicago that is composed of a series of affluent, politically astute, suburban communities. NSSED, which has been in existence since 1960, serves approximately 5,000 handicapped children in a total school population of 47,000.

Mississippi

- Itawamba is a rural county in northeastern Mississippi whose main industry is agriculture. The dispersed population of 3,700 students is served by 7 schools in the district. The special education program was instituted in 1973 and serves 181 students. The program is supplemented by close cooperation with the SEA and state-directed Area Learning Resource Center.
- Pascagoula Independent School District is located in Jackson County, one of the most affluent in Mississippi, due to an economy based on light and heavy industry. The population is diverse, including Indians and Vietnamese who have settled in the area and who are supportive of school programs. Two nearby universities provide the district with technical assistance as well as teaching personnel. The school district serves approximately 9,000 students of whom between 625 and 675 are in special education.

Oklahoma

- Guthrie is a generally low-income, rural community located in central Oklahoma whose population is largely made up of migrant and retired individuals and small-factory workers. The Guthrie School District serves 2,700 to 3,000 students in grades K-12, of whom 222 are served by special education. Limited local funds have hindered the availability of resources and made the district largely dependent on state and federal support.
- Tulsa is the second largest city in Oklahoma; its major employers are the aerospace and aviation industries. The Tulsa School District serves approximately 60,000 children located in 4 counties covering almost 140 square miles. The parents and advocacy groups within the community are strong and active. Qualified staff are an accessible resource and there are two nearby state schools to serve the severely handicapped (Oklahoma law prohibits paying for services in private schools).

Pennsylvania

- Bucks County Intermediate Unit consists of 13 school districts located in a suburban area north of Philadelphia. Intermediate units replaced the county school operations in the early 1970s and are responsible for the support services for all school districts under their jurisdiction. An estimated 12,000 exceptional children in Bucks County are served by public schools, a number of private schools, a private licensed facility, and a state school and hospital.
- Central Susquehanna Intermediate Unit (CSIU) encompasses 17 school districts within a 5-county rural region of central Pennsylvania. The CSIU provides approximately 68% of all programs and services to the region's 4,000 handicapped students and is responsible for the educational programs at 2 state institutions.
- Philadelphia School District is its own intermediate unit, organized into 8 sub-districts, and has a public school population of approximately 153,000 students of whom 20,000 are in special education. Of the state's 44 approved private schools for the handicapped, 33 are in the Philadelphia area and the parochial school system is almost as large as that of the public.

Rhode Island

- Coventry is a middle-class community, considered to be a suburb of Providence, and covers a fairly large geographical area. Of its approximately 5,500 students, between 380 and 420 are identified as having some handicapping condition. Due to its proximity to Providence and the small size of the state, the district has access to a variety of state-supported and private facilities.
- Woonsocket is a manufacturing town whose population has a strong French background. The Woonsocket Public School District consists of approximately 9,700 students and serves about 900 handicapped children. The special education budget is largely subsidized by the state and, because the town is fairly near to the capital, it has access to a variety of state-supported and private facilities.

Tennessee

- Campbell County is situated just south of the Kentucky border in northeast Tennessee and covers about 600 square miles of rural Appalachia. The area is the largest coal producing district in Tennessee and people living in the outlying areas of the county lead a very rural lifestyle.

The school district covers seven towns, and special education serves approximately 17% of the 7,000 school-aged children. Campbell County is part of a four-county cooperative that provides many general services, and the state provides technical assistance and compliance monitoring through regional offices.

- Memphis, noted as an educational and medical center, is a large urban area located in the southwest corner of Tennessee. Two large universities and a number of colleges provide the school district with trained personnel. The Memphis City School System serves 125,000 students in 126 schools, including 16,600 handicapped students. The private school population has increased since the institution of court-ordered busing.
- Nashville is the second largest city in Tennessee, the home of country music and the state's capital. Within the Nashville area there are several major colleges and universities that the school district uses as a source for staff development, program innovations, and personnel recruitment. Advocacy groups are very active and were instrumental in getting legislation, based on the Council for Exceptional Children model, enacted in the state. The Metropolitan Public Schools serve approximately 76,000 students, of whom about 11,000 or 14% are handicapped.

Washington

- Edmonds School District is located in Snohomish County and is considered a suburb of Seattle. The major employers are Boeing Aircraft and the school district; the economic make-up of the district is diverse, ranging from upper to lower income families. Edmonds is the fourth largest school district in the state with a pupil enrollment of 23,500. Special education programs serve approximately 1,500 students and include a separate facility for the severely handicapped. Several universities in the Seattle area provide trained personnel to the school district.
- Longview, Washington, is located on the Columbia River. The sound economic base of the city has made the Longview school system the second wealthiest in the state of Washington. The total enrollment is 8,052, with special education pupils making up 241 of that number.
- Yakima is located in southcentral Washington in the fertile Yakima Valley whose economy is based on agriculture. The West Valley School District is one of three in Yakima proper. The district is small and rural, with a school population of 3,315 students that includes 230 students served by special education.

Data Collection

During the 1978-79 school year, we collected data during two 2-4 day visits to each of our sites, one in the fall and one in the spring. Each visit was conducted by two members of our core staff. Site visitors spent most of their time conducting interviews and collecting forms and documents to supplement interview notes. (They also attended meetings and observed ongoing programs when these could be arranged.) Following each visit, the primary site visitor wrote a case study report. The rest of this section describes our data collection procedures more specifically.

Debriefing

Each cycle of data collection begins with a set of decisions about what topics to pursue and in what depth to pursue them. To ensure that the data collection results in information that is comparable across sites for the cross-site analyses, we developed what we call a "debriefing" format.* It serves both as a guide for the site visitor in collecting data and as the actual format for writing up field notes after a site visit is completed. The debriefing format focuses the site visitor's attention on a common set of topics yet, depending upon the particular circumstances of each site, also allows the site visitor the freedom and flexibility to decide how and to what extent those topics are pursued.

The debriefing format is derived from the current conceptual framework (see Appendix A) and reflects the emphasis of the particular site visit. For example, during the 1978-79 school year the fall site visits focused on school level personnel; much of the debriefing format was therefore devoted to events that occur at the school level, such as referrals and IEP meetings. In contrast, the spring site visits focused on events at the district or IU office, relations with groups outside the school (such as parent advocacy organizations), and interagency coordination.

Before each site visit, a new debriefing format is developed by the core analysis staff.** It lists the topics to be covered

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* To keep this report of tolerable length, we are not supplying examples of our materials in the appendix. We will be happy to supply them to interested colleagues upon request.

** Unlike what occurs in much case study research, the size of our staff permits some specialization of functions between site visitors (n=5) and those whose primary responsibilities are design and cross-site analysis (n=3).

during the site visit, is structured as an outline, and is written at a level sufficiently general to allow for differences among sites. For example,

> Describe the nature of the LEA's most satisfactory relationship with another public service agency. Include the reasons why it is "most satisfactory," whether there are formal as well as informal agreements, and whether there is state or higher level local support for the relationship.

The draft debriefing format is circulated among the site visitors to determine if all the topics are clear, whether they will be interpreted in the same way, and whether important ones have been omitted. At the same time, a draft of the criteria for respondent selection is circulated. Both of these drafts are then revised as necessary to reflect site visitors' reactions and concerns.

An expanded version of the debriefing format allows for one or more pages of writing space in response to each item. Upon returning from a site visit, it takes a site visitor from 1 to 3 weeks to prepare a complete debriefing. When complete, the debriefing is the recorded descriptive analysis/case study report of a given site for a given visit. All the debriefings for a given site are its case history.

Site Visitor Training

Training site visitors has two primary purposes. First, it ensures that they have a shared understanding, along with the analysis staff, of the conceptual framework, the debriefing format, and the manner in which various topics are to be pursued on the upcoming visit.* This aspect of training is one way we attempt to maximize reliability. The second purpose is to teach the site visitors specific skills to maximize the validity of the data they collect (primarily from interviews).

For the data to be comparable across sites and across site visitors, it is essential that the site visitors view the study's purposes and conceptual grounding in the same way. For this to happen, the site visitors must be immersed in the development of the concepts on which the study is based and the ways in which these abstractions are translated into data collection procedures and topics. Immersion cannot occur in a one-shot training session; therefore, the training for this purpose is ongoing, as

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* The site visitors' backgrounds are varied, each having begun this study with experience or training in field-based educational research, teaching, and/or special education.

exemplified by site visitor involvement in the final versions of the debriefing format and criteria for respondent selection. This aspect of training has both formal and informal components. The site visitors are involved in each phase of the study, from meetings to explain iterations in the conceptual framework to participation in all stages of data analysis. The fact that the same visitors remain with the study from year to year means that the impact of this immersion/training is cumulative.

Training for the purpose of imparting specific data collection skills, although grounded in the shared understanding described above, is more formal in its procedures. Validity of the data must be assured; to accomplish this goal, we rely on fairly traditional methods such as "cross-examination" and triangulation. Through simulation exercises with volunteer parents and school personnel from districts in the vicinity of SRI, for example, site visitors learn to probe respondents, asking the same question in different ways, and pursuing topics both directly and indirectly to test relevance and consistency. They are also trained to draw inferences systematically on the basis of multiple sources of data. This so-called "triangulating" among respondents and other evidence sources is an important skill in obtaining an accurate rendition of a particular event--where accuracy is defined as "the common understanding of an event that avoids the biases of a single respondent." Finally, the site visitor training emphasizes that, when appropriate, they verify their perceptions immediately by paraphrasing a respondent's answer and requesting the respondent to acknowledge mutual understanding. Thus, site visitors are trained to be concerned with establishing validity through "structural corroboration" (Guba, 1978), ". . . a process of gathering data or information and using it to establish links that eventually create a whole that is supported by the bits of evidence that constitute the whole. Evidence is structurally corroborative when pieces of evidence validate each other" (Eisner, 1979, p. 215).

In addition to these two purposes, formal training sessions provide an opportunity for the staff to read and discuss relevant literature and to strengthen their knowledge of the law and regulations. These sessions occur in the last few days before the wave of site visits is scheduled to begin. Meanwhile, to prepare for their upcoming trips, the site visitors have been engaged in other activities besides this training.

Selecting Respondents

It remains for the site visitor, in preparation for each site visit, to perform the complex task of selecting the actual respondents and setting up the interview schedule with his or her site liaison. As described earlier, the topics to be covered during a given site visit are specified in the debriefing format. Also derived from the conceptual framework are criteria for selecting respondents to be interviewed on the specified topics.

These criteria may be in the nature of a role description (e.g., "a director of special education"), or they may specify something about the kind of information needed (e.g., "a parent who can present a balanced point of view"). The site visitor's decisions are based on his or her unique combination of knowledge of the topics to be pursued and the particulars of the site known from previous visits. Within the common guidelines, the site visitor determines which types of respondents are needed and makes specific choices based on the quality of information received from particular individuals in the past and on accessibility and other logistical concerns.

Where choices of respondents require sampling decisions to be made (e.g., among districts in an intermediate unit or among schools in a district), our approach is modeled after the logic and spirit of our strategy for selecting the original sample of sites. In making these decisions as well as less subtle ones, the ability of the site visitor to contact knowledgeable individuals on site by telephone in advance of the visit is crucial to making the best choices. Thus, an important aspect of the site visitor's role is to maintain good relationships with key contacts in the LEA. To underscore how important we view these relationships, we have established a policy of sending a project newsletter to our sites in advance of each visit.

After an interview schedule has been developed, the site visitor continues preparation for the visit by specifically tailoring the debriefing format to the particulars of the given site. This preparation involves reviewing past debriefings to determine what further information will now be sought from particular respondents. The results of these various preparatory activities is an open-ended interview guideline, annotated to prompt the site visitor not to overlook certain questions.

"Rotating" Site Visitor

Each visit itself is conducted by a two-person team. The (permanent) site visitor is accompanied by a member of the analysis staff (or perhaps another regular site visitor) in the role of "rotating" site visitor. The advantages of having the same person return for every visit are obvious: familiarity with people on site greatly increases trust and gives the site visitor greater access to more accurate and detailed information. The advantages of our rotating site visitor strategy merit some explanation.

From the case study point of view, the rotating site visitor contributes to improving both reliability and validity. As a classic reliability check, the rotating site visitor provides partially independent confirmation of the permanent site visitor's perceptions and interpretations. In addition, whatever biases the permanent site visitor may bring as a result of his or

her continuing relationship with people on site are at least different from those of the rotating site visitor. Moreover, the rotating site visitor has knowledge of other sites unfamiliar to the permanent site visitor and, by providing a new perspective during the visit, may be able to prompt the permanent site visitor to generate fresh hypotheses. This directly contributes to the validity of our findings. Finally, a two-person team can divide the tasks of asking questions and taking notes between themselves in order to do both as well as possible. This produces comprehensive field notes with many direct quotations.

From the cross-site analysis point of view, it is crucial that members of the analysis staff be able to visit as many different sites as possible. A rotating site visitor can interpret events at one site as instances of more general patterns. Conversely, what appears to be one kind of problem when interpreted in the context of one site may appear entirely different when contrasted with another site. (For example, the difference that an excellent administrator can make may be overlooked by someone who has never seen one in operation.) This subject is discussed at greater length in the following section.

Apart from what we have described to this point, what actually happens on site visits varies as much as the sites themselves. Last year, the visits were usually 2 or 3 days in duration, but ranged from 1 to 4, depending on the site visitors' judgments of the time necessary to do their jobs adequately. In the fall, when we focused on school level personnel, we interviewed as few as 10 and as many as 22 repondents per visit. Spring visits typically involved fewer respondents. Most visits begin with a courtesy call to the administrator who is the key site contact. In spite of best efforts to plan a schedule of interviews, it is not unusual for site visitors to have to do a lot of reshuffling once they arrive.

The one commonality worth mentioning is a conscious effort to schedule interviews in a "bottom-up" sequence. For example, where feasible, site visitors interview teachers before interviewing principals, principals before district administrators, and district administrators before school superintendents. This sequence is most consistent with the explanatory model in our conceptual framework. It allows the site visitor to construct or follow a trail of explanations to the limits of the scope of our study. It also has the advantage of giving the site visitor some substance with which to motivate an interview with a "higher up" in the system.

Data Analysis

This section is divided into two parts. The first part describes procedures and methodological concerns in the preparation of individual case study reports ("debriefings"). The

second part describes procedures and considerations in performing cross-site analyses on our data.

Individual Case Studies

With few exceptions, our data are qualitative. Before being analyzed by the permanent site visitor, the data consist primarily of interview notes. Whatever forms and documents that have been collected on site are usually mere supplements to these notes, in the sense that their availability makes it possible to focus interview time on questions that cannot be answered by reference to the documents.

The format for data reduction is the debriefing format, which we described above (see "Debriefing"). The site visitor responds to each item in this format with prose that may range from a sentence or two to several typed pages. Responses vary in depth and subtlety, and particularly in the thoroughness with which each topic is treated at different sites. Each response describes some event or activity and, according to the approach dictated by our conceptual framework, embeds these descriptions in their local context. To illustrate the flavor of these responses, here is a sample from an actual report:

> Private schools became an issue when district officials tried to bring back into district-sponsored programs all children (mostly LH [learning handicapped]) that they had formerly placed in private schools. The district felt that . . . they now had the programs to serve these children. According to the special ed personnel, the transition was being accepted by parents during conferences at which the district assured parents that their child could go back to the private school if things didn't work out in the public program. Then a representative from the private school association came on the scene and, as a result of his persuasion, many parents decided they would oppose the change back to public school placements through fair hearings (the private schools provided the resources).

This particular example also illustrates the general point that explanations are often conveyed most effectively by stories or quotations.

The essence of these case study reports is their context-dependency. The original version of the first debriefing format began with a section called "background," which was intended to be a cursory, mainly historical description of the site's characteristics. As the structure of the debriefing formats evolved in use, this section became a "preamble." Simply, this evolution reflects the degree to which site visitors feel the necessity of

providing a less cursory context for their responses to individual items. The best debriefings are filled with cross-references among items, because the format has forced the writer to break a complexly interconnected story into discrete units.

To transform raw interview notes into discrete responses to specific items, the site visitor must reorganize the notes from a "by-respondent" structure to a "by-topic" structure. In doing so, the principal mental activity of the site visitor is selection. Each visit confronts the site visitor with a potentially bewildering array of possibly significant facts and explanations. The process of selection begins with the planning for the visit, continues throughout the interviews, and characterizes every decision that goes into the case study report. Between the guidelines of the conceptual framework and the techniques of establishing structural corroboration, the site visitor must eliminate the insignificant and fix on what emerges as salient and important. This process is imperfect; it is too subjective for many researchers' taste; it relies on intuition and judgment. Nevertheless, given the experience of our staff and appropriate training, the process works. It produces fascinating descriptions and explanations of what is going on at individual sites.

The principal methodological issue in these case studies concerns the degree of certainty one can have about a characterization based on a limited number of respondents. This concern is one of the most significant trade-offs we have to make between depth, which implies spending more time at each site, and breadth, which implies a greater number of sites than can be investigated optimally. Of necessity, we adopted a policy of pragmatism about depth of evidence. When two sources contradict each other and no other relevant evidence exists, we always say so. Otherwise, our guidelines for writing debriefings advise site visitors to use language precisely to convey the basis for any uncertainty. This policy might have serious drawbacks if our approach to cross-site analysis were more conventional. Given the approach we adopted, however, the actual degree of uncertainty in individual case studies is more than tolerable.

Cross-Site Analysis

In performing cross-site analysis, we had several objectives that could only be met by data from a variety of sites with diverse characteristics. One important objective was to provide summary descriptions of those aspects of local implementation that are reasonably uniform across sites. Examples of such findings are that all LEAs have IEP procedures in place and that they tend to make placement decisions on the basis of openings in available programs.

Another important objective was to describe differences in implementation from site to site and to attempt to explain these differences in implementation by identifying other differences

among sites with which they are associated. One example of this kind of finding is that LEAs in states whose regulations conflict with federal regulations are having a more difficult time with implementation than LEAs in states whose regulations do not conflict. This example is one that we anticipated in our site selection strategy. Another example is that LEAs with "boundary crossing" school-based personnel, such as resource teachers, are having more success with "mainstreaming" than LEAs without such personnel. This example emerged from our analyses.

An additional objective of the cross-site analyses was to test the generality of explanations for events at individual sites that appeared to provide support for our conceptual framework. For example, we were told at one site that informal meetings for the purpose of establishing priorities among referrals were necessary because there was no other way to keep from overloading the system's capacity to evaluate children within legal timelines. This explanation, of course, fit our conceptual framework perfectly. The relevant questions for cross-site analysis were the overall prevalence of such "prescreening" meetings and the extent to which their presence or absence is related to a perceived limit of the system to handle unprioritized referrals.

Thus, the purpose of cross-site analyses was to make inferences across sites about LEAs in general. Analyses were performed to test the extent to which statements of findings could be supported across all our sites, or could be associated with certain characteristics explaining differences among LEAs.

As a result of our approach to the individual case studies, the debriefings contained descriptions and explanations that relied heavily on details of each site's local context. For some of the goals of our cross-site analyses, retrieving the relevant information directly from the debriefings (e.g., whether notification and consent procedures are in place) was quite straightforward. For other purposes (e.g., testing inferences about connections between timelines and prescreening mechanisms), it was impossible. In many cases, directly retrieving relevant information from the debriefings was logically possible but logistically difficult and inefficient. Accordingly, we decided we could accomplish all our goals most efficiently with an approach that made more direct use of the field notes and knowledge of the site visitors and less direct use of the debriefings themselves.*

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* We also decided to capitalize on our iterative approach by modifying our individual site case report procedures for next year by shaping them more specifically to feed into our anticipated cross-site analyses.

The approach to cross-site analysis we adopted recapitulates the logic of an individual case study. Each of the 22 individual sites in our study is treated as a "respondent," in the person of the site visitor permanently assigned to that site. The topics of interest are constrained by the six SEP evaluation questions, our concern for policy relevance, and our conceptual framework. Procedures are designed to ensure that a wide variety of hypotheses are generated and that the most reasonable and interesting of them are tested against the data. Finally, the findings are selected and organized with the goal of highlighting and exemplifying important themes and patterns. The remainder of this section describes the procedures in more detail.

The first step in our cross-site analysis was to generate a file of potential findings. Each member of the staff was asked to generate an unstructured list of statements that he or she "would like to see in the final report." These statements were written on file cards. The heuristic suggested to site visitors, who were in the process of completing their debriefings, was to think of interesting findings at their sites and then write them as if they were true at more than one site. Members of the analysis staff who had been to several sites as rotating site visitors tended to write statements on a more general or abstract plane than permanent site visitors. Statements were made in varying degrees of detail and abstraction by everyone who participated in this activity. Here are two examples drawn arbitrarily from the original file:

> Schools feel pretty confident that they have taken specific and adequate steps to inform parents of their rights. They typically say they provide something in writing and present the information verbally.
>
> Although teachers spend a lot of time doing IEPs, they don't find them all that useful on a daily basis.

We were aware that our biases were not independent, and therefore built into the procedure an exhaustiveness heuristic. We compiled a list of sources for statements in addition to ourselves (e.g., SEP documents, periodic newsletters, notes from staff meetings over the previous year), and then systematically went through these sources and wrote statements from them. By the time our file had grown to over 1500 cards, we were convinced that we were not omitting anything important.

The next steps began the first wave of selecting and organizing the potential findings. A major effort was devoted to sorting the cards according to categories developed in a tentative final report outline. After the cards had been through this gross sort, a member of the analysis team took each category and broke it down into subtopics, each of which could be discussed in a paragraph or two. At this stage, duplicates were removed and

very similar statements were clipped together. This sort reduced the total number of cards to fewer than 1,000.

At this point, members of the core analysis staff went through the file and flagged those statements that were relatively general and abstract (i.e., stated in a manner more like cross-site findings than like individual-site findings). The cards that represented specific instances of more general statements were removed and filed for later reference. We made certain that we included all the points we wanted to make (if they were supported by data). From that time on, we continued to work with only this subset (about 250) of the cards.

Our next sorting was done according to the type of statement on the card. A distinction was made among assumptions, findings, and conclusions, though some overlap was tolerated. This sort separated the assumptions or conclusions from the findings. From within the findings, the more specific statements were grouped under the related, but more inclusive, general statements. This sort narrowed our file to about 30 categories of cards, each category corresponding in one way or another to a set of findings (e.g., IEP meetings, "mainstreaming," due process hearings).

The next step was to format these 30 sets of cards into an outline of the findings in a final report. The analysis staff worked "from both ends" to converge on this format. At one end we worked with the set of cards in a spatial array, which we moved around to represent relative distances, conceptually, among topics. At the other end, we took into account our sense of the information needs of the various audiences for the final report. The result of this exercise was a new emergent outline that became, in fact, the working outline for the findings chapters of this report.

To summarize, at this point in our cross-site analysis we had produced a set of a few hundred statements that were organized according to a possible final report outline. If all of these statements were unequivocally true, the findings chapters essentially would have been written. Of course, the veracity and generality of these statements remained to be tested.

The next step in our cross-site analysis was to produce a "draft list of propositions for site visitor review." Unlike the statements that served as input to this step, the propositions were carefully worded to constitute an integrated whole. Under each of 21 headings (e.g., "eligibility and identification," "in-service training"), propositions were listed in sequences intended to convey an organized presentation of a finding. Within each sequence, an attempt was made to break down the structure of an argument into component statements. Following are two examples of simple propositions:

3.c. Regular classroom teachers express a need or desire for more useful training in how to make referrals.

16.a. The greatest impact of the law at the school level has been to add new duties to old ones.

These propositions were written for the specific purpose of systematically eliciting carefully structured responses from the site visitors. Accompanying the 33-page list of propositions were two pages of instructions and two different response formats. Site visitors responded for each of their sites independently. For each proposition, the basic response format asked for any "qualifications, examples, and quotations" that the site visitor wanted to offer.* In practice, site visitors were encouraged to use the "comments" column to indicate explicitly the sense in which a given proposition did or did not apply to each site.

Several points about this exercise bear emphasis. First, there was some presumption that the propositions were generally true but needed to be qualified appropriately. Everyone understood that the purpose of the exercise was to produce a report of findings in which words would be used as precisely as possible to convey the conditions under which the propositions were true and the conditions under which they were not true. As a result, site visitors were encouraged to disagree with the implied generality of a proposition by explaining precisely how a given site was an exception. In addition, they were free to use the "don't know" response category and often did so, particularly when they were uncertain as to whether the evidence from a site was solid. This response option protected us against making inferences across sites that relied on shaky data from an individual site. Moreover, many of the propositions made reference to conditions that did not hold at all sites (e.g., due process hearings). In these cases, the appropriate response was "doesn't apply," which was often accompanied by a description of the reason. The same response format was used to elicit relevant examples and quotations, which were typically drawn directly from the debriefings. Thus, an important function served by the exercise was to make the writing of the final report a truly collaborative enterprise. Not only did site visitors' responses determine which propositions remained unchanged, they also provided cases in point, exceptions, and the specifics of qualifications.

After site visitor responses had been given to all the propositions, the analysis staff was in a position analogous to that of the site visitor writing a debriefing. For each of 21 topics, the "data collection" stage of the cross-site analysis procedure had produced 22 sets of responses to be integrated.

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* The other response format, rarely used, invited site visitors to restate the proposition however they wished.

Qualifications to the propositions had come in many guises. At this point, the analysis consisted of deep immersion in the data on a topic-by-topic basis. Our actual procedure involved assigning a member of the analysis staff to study site visitor responses to a particular topic, and then to draft a summary of the qualifications to the propositions necessitated by the site visitor responses. Working with these notes, and sets of examples and quotations from the debriefings, we were able to write each section of the findings chapters.

When all site visitor responses were yes or no, or there were one or two clear exceptions, it was relatively easy to generate descriptive text from the propositions. When responses were divided, we referred to our "site factor matrix" to see if the division could be explained by characteristics of sites similar to our original site selection factors (see Tables 1 and 2 and accompanying text, above). We also looked for new explanatory factors that emerged from the analysis (e.g., the previously mentioned presence or absence of resource teacher types). When we failed to make sense out of the pattern of responses, we rejected the proposition as useless or decided to pursue the issue next year rather than attempt to report on it prematurely.

By adopting an inductive approach to cross-site analysis, we freed ourselves from the necessity to use every site to test every proposition. Instead, we limited our search for generalizable explanations to the subset of sites that provided both relevant and reliable data on a particular matter. Thus, different sites were used for different purposes, as appropriate. This approach enabled us to avoid the loss of interesting and important findings that appeared in only a few sites or in different forms in different sites.